

## Chapter 3

# Public Involvement

This chapter includes three main sections: Informed Decisionmaking (Question 1), Working Together (Question 2), and Competing Values/Limited Resources (Question 9).

### Informed Decisionmaking (*Question 1*)

***Question 1: Informed Decisionmaking.* What is the appropriate role of local forest planning as required by NFMA in evaluating protection and management of inventoried roadless areas?**

This section includes four subsections: Informed Decisionmaking General, Decisionmaking Authority, Local vs. National Decisionmaking, and The Forest Planning Process.

#### Informed Decisionmaking General

##### Summary

The most persistent general remark regarding informed decisionmaking is that the Roadless Area Conservation Rule, in the form in which it was signed in January, 2001, represents informed decisionmaking at its best. This remark follows a recurring theme in comment on the Advance Notice of Proposed Rulemaking—the Rule, respondents state, is the result of more than 600 public hearings and 1.6 million public comments, which they believe should prove that the American public is behind this policy. These respondent consider the Rule as it now stands is a good example of informed decisionmaking. Respondents also encourage the Agency to make the best decisions it can within existing constraints, to streamline the decisionmaking process, and to avoid making decisions merely to avoid litigation. To aid in decisionmaking, some suggest making roadless area decisions through an allocation process, or issuing a preliminary document for public review.

**188. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule is a good example of informed decisionmaking.**

Informed Decision making: The Roadless Area Conservation Rule as it now stands is the result of more than 600 public hearings and 1.6 million public comments, the vast majority of which supported protection of our national forests. The rule as it now stands is a good example of informed decision making. Future NFMA planning for these inventoried roadless areas should be guided by the Roadless Area Conservation Rule. (Individual, Reno, NV - #A5110.10152)

The RACR was an appropriate resolution of the RACR, being universally available to public comment, and demonstrated the sometimes-overwhelming need to respect a national demand. Every interested

party mentioned had the ability to comment, early and often. If the Forest Service is going to switch to another model of decision-making, now is not the appropriate time. The RACR is an appropriate national sidebar for management of all National Forests, akin to avoiding harvesting on slopes greater than a certain degree or on lands that have not been surveyed for wildlife, neither of which we question as being an abridgement of local authority. (United States Representative, Georgia - #A693.14410)

The Roadless Rule was signed following almost 30 years of research and an extensive public review and comment period, which generated the largest number of responses ever in the rulemaking process—mostly in favor of the rule. Many citizens spent much time and thought responding to the Roadless DEIS. This administration is, in essence, discarding the efforts and input of 1.6 million Americans by ignoring the previous process. The current ANPR process, by comparison, has had little publicity and no public meetings and asks us to respond to questions, which have already been answered. Others, when asked if they have comments on Roadless, reply that they have already done that—last year. This process is not fair and open. It is not soliciting meaningful dialogue and input; many are not even aware it is occurring. The administration is attempting to recount the votes, relying on a low response, so it can change the Rule to fit its own agenda to the benefit of the extractive industries. As justification for issuing the ANPR the USDA cited eight lawsuits, which shared the common allegation that there was an inadequate opportunity for public review and comment on the Roadless Rule. The Attorney General, whose responsibility is to uphold federal law, did nothing to defend the Rule or the process—there was no defense of this federal rule by any federal entity. We have had a fair and open process on the Rule. The ANPR process is the opposite. (Individual, Klamath Falls, OR - #A5118.14000)

**189. Public Concern: The Forest Service should recognize that informed decisionmaking processes have occurred under the National Forest Management Act and state wilderness bill processes.**

I can't help address point one on informed decision-making. I believe this process (informed decision-making) has occurred under the NFMA and individual state wilderness bill processes. I have been involved in both processes in Colorado and Montana over the years, and can vouch for the thoroughness of these exercises. RARE I and II were nearly exhaustive in their scope, and later roadless inventories on individual districts rounded out the investigations. Forest Planning was not always so detailed, but this process gave ample opportunity for input and informed decision-making.

One positive benefit of these exercises was the opportunities for heightened awareness on the part of the public who participated. Whether our learning came from advocacy groups, or from planning and forest staff, anyone who went through these exercises was the wiser for the experience. When I, and thousands of others attended roadless area meetings that led to the rule, we benefited by the earlier processes. I have to say, that if the opponents to roadless areas are complaining about the rule, what they are really complaining about is government . . . (Individual, Bozeman, MT - #A6287.10157)

**190. Public Concern: The Forest Service should use the best available means within existing constraints in decisionmaking.**

*Many assert that the appropriate process for evaluating and making long-term resource management direction—including inventoried roadless area protection and management—is through the local forest planning process, which is governed by the rules at 36 CFR 219.*

The phrase “the most appropriate process” fails to reflect the fact that decisions are made and must be made within specific contexts. The Forest Service, for example, can not spend the entire GNP of the United States in its efforts to make any particular decision. Other parameters limiting decision-making include but are not limited to time, staff, uncertainties in communications, and imperfect information. Decisions should be made using the best available means within constraints active at the time. (Individual, Nederland, CO - #A19016.11110)

**191. Public Concern: The Forest Service should streamline the decisionmaking process.****TO ELIMINATE LONG DELAYS**

The decision process should be timely and eliminate the long delays brought about by layer after layer of legal traversing.

Paper shuffling and multiple studies on the same research topic or proposed management action must be eliminated. The USFS [should] become more time constrained, more oriented to actual on-the-ground results. (Individual, Libby, MT - #A10531.12000)

Finally, make a decision and implement the decision as quickly as possible. It's OK if everybody doesn't like it. The roadless issue has dragged on far too long. Our resources are suffering because of indecision. (Business or Association, Spokane, WA - #A21364.10130)

**192. Public Concern: The Forest Service should not make decisions merely to avoid litigation.**

The Forest Service must make decisions based upon the welfare of the forests and the interests of all Americans in that welfare. Therefore, it must not consider the litigiousness of participants in any of these processes. In other words, the Forest Service must not make decisions based upon its desire, or upon the desire of local Forest Service employees, not to be sued in court. Where a pattern of frivolous lawsuits is discernable, the Forest Service should petition the Department of Justice or U.S. Attorney's Office to seek monetary sanctions against the offending groups and the attorneys that represent them. (Organization, Denver, CO - #A29624.15100)

The Forest Service cannot let the fear of a lawsuit unnecessarily influence its forest management decisions or the timely implementation of actions such as timber harvest. The Forest Service also has a responsibility in the continued viability of the United States industrial base, and cannot let the fear of lawsuits result in an over dependence on foreign products due to a lack of U.S. production. (Individual, No Address - #A28621.15166)

**193. Public Concern: The Forest Service should make roadless area decisions through an allocation decision process.**

I think this rule should specify a process that allows people with a wide range of views to participate as representatives. The letter writing campaign approach voting for or against a decision is not what was specified by congress and the president through the NEPA law. I think this IRA issue is of such import and is steeped in strong opinions that it needs an allocation decision process that facilitates participation of the stakeholders but forced to go through an analytical process reporting the effects and trade-offs with a decision at the end that allows a portion of finality at least for a specified time period (15 years) and during that time then projects don't have to reanalyze the roadless value issue again. (Individual, Missoula, MT - #A28297.15100)

**194. Public Concern: The Forest Service should issue a preliminary document for public review.**

Preliminary forest plan rewrites or updates can be prepared using known interests of various groups including local communities and tribes. Suggestions can be solicited. It's important to issue a preliminary document for review because it will generate the needed thought, especially if there are areas or items of disagreement such as road closures. Meet and work out the details. (Individual, Minneapolis, MN - #A8016.15111)

## Decisionmaking Authority

### Summary

**The Forest Service** – A variety of respondents suggest that decisionmaking authority should remain with the Forest Service. Some say the Chief should make decisions regarding management of roadless areas, but others defer to the Agency in general. Respondents say the Forest Service should make decisions rather than Congress, rather than politicians in general, and rather than the public. One association states that collecting comments from all interested parties does not divest the Forest Service of its obligation to make decisions based on what is best for the land and its inhabitants, within the confines of the current framework and congressional direction. This respondent does not believe the general public qualified to direct decisions nor should they be held responsible for land management decisions.

Respondents offer a number of suggestions on how the Forest Service can best carry out its decisionmaking responsibility. Some of these include developing uniform direction for the procedures to be used in roadless area management decisionmaking; conducting large regional meetings of forest officials; allowing each national forest to assume the lead responsibility for developing management proposals; giving the district ranger greater decisionmaking authority; and allowing local forest managers to have complete decisionmaking authority.

Some suggest that the Forest Service should insulate local officials from decisionmaking so they will not suffer negative repercussions from locally unpopular decisions. Finally, some ask the Forest Service to clarify its authority and relationship with Congress, as well as the discretionary authority of the responsible official.

**Legislative Bodies/Other Groups** – A number of respondents assert that Congress should manage federal lands. According to some individuals, federal land, in general, should be managed at the federal level in Congress, where there is equal representation. Those who take this position say congressional decisionmaking would allow better consideration of local conditions, an end to the present stalemate over roadless area management, and more consistency in forest plans. Others suggest that the Forest Service develop management plans, then submit them to Congress for final approval.

Other respondents suggest that states should manage federal lands. What would be most useful, submits one individual, would be to turn all federal land over to the states and let them manage. Both those advocating congressional management and those advocating state management stress the point that decisionmaking should be the purview of elected representatives. Elected representatives, they argue, would be more responsive to local concerns and more accountable for their decisions.

Finally, people suggest that various other groups be decision makers. Suggestions include committees composed of various groups: unaffiliated individuals, representatives of different interests, scientists and Forest Service specialists, or a committee assigned by county commissions.

**Trust and Integrity** – Comments evincing distrust toward the Forest Service and/or the prior or current Administration are among the most prevalent comments on the Advance Notice of Proposed Rulemaking. Respondents assert that the Forest Service should avoid making decisions in secrecy or with preconceived outcomes in mind. These respondents frequently comment that

politics should be kept out of the decisionmaking process. According to one respondent who uses the Tongass Forest Plan Revision as an example, the conceived failure of that planning process did not come from local decision authorities, but because the national office became involved in the decisions, decisions considered political but not applicable for the Tongass National Forest. This respondent sees this as proof that national level policies are politically driven, while local planning is based on science and what is best for effected citizens.

People state that the way the Forest Service handled the Roadless Area Conservation Rule has damaged its public relations and community support. One individual believes that local managers were pressured by higher management to identify roadless areas during development of the Rule.

At the same time, other comments reflect the public's suspicions regarding the motivation behind this round of comment. One individual alleges that this administration must be trying to get rid of the Roadless Rule, by sending it out for comment again. Along this same line, some say the Forest Service should acknowledge its bias toward resource users, claiming that the agency will screen out suitable roadless areas to be conserved, in order to satisfy consumer needs.

Both those who ask that the Rule be implemented, and those who ask that it not be implemented, assert that the Forest Service should work to regain the public's confidence. According to one individual, there have been times, especially under the Clinton administration, that the government seemed to do whatever it wanted, regardless of what the majority of people wanted. This person points out that it is hard to have confidence when people do not believe they are being listened to. Other respondents reference the fee demo program as an example of violating public trust, while charging permittees, such as grazing, under market value, the Forest Service seems to be taxing recreationists for low impact use of the land while resource users are subsidized for impacting the environment. (See the Executive Summary for a more general discussion of trust and integrity comments on the Advance Notice of Proposed Rulemaking vis-à-vis those on the Roadless Area Conservation Rule Draft EIS.)

## *The Forest Service*

### **195. Public Concern: The Forest Service Chief should retain decisionmaking authority.**

Chief Bosworth, you are the one who can decide for the common good, for the long-term. You and I both know that once the beauty and serenity of wild nature is gone, it is gone forever!!! We can't change our mind. Please do not let us lose any more of our fabulous national heritage of nature and wilderness!! (Individual, Denver, CO - #A11769.12122)

The role of forest level planning is to involve local public interest in advising and informing decisions on national forest management. Due to the need for informing decision making on the remaining small percentage of public lands represented by the roadless area conservation plan I feel the decision level [appropriate] for these lands is at minimum the Regional Forester and best at the Chief's level. (Individual, No Address - #A30117.13100)

#### **OVER ROAD CONSTRUCTION IN ROADLESS AREAS**

Retain any final decision authority to build roads in roadless areas with the Chief of the Forest Service. (Individual, Lyons, NY - #A1737.12122)

**196. Public Concern: The Forest Service should decide the management direction for roadless areas.**

We expect you to manage our public lands. We expect you to decide, by yourselves, if necessary, on the correct course to take and then take it. You are not referees between competing relations or philosophies. You are professional land managers and we expect you to go out and manage the land. The only real mistake you could make would be to do nothing while the situation grows more desperate. (Business or Association, Spokane, WA - #A21364.12120)

Surely the primary responsibility of a conservation administration is to conserve; in particular, to preserve this precious American heritage that has survived since Colonial times. If the United States Forest Service will not protect these forest fragments, then who will . . . ? (Individual, Tallahassee, FL - #A6255.12120)

While we recognize the predicament the agency faces as land manager, it is still up to the management agency to make the final decision on how its lands will be managed. Clearly, the Forest Service would like to be all things to all people, but this is unrealistic. Simply put, the Forest Service must conduct a comprehensive analysis of the lands in question, take into account scientific data, take into account community needs, make reasonable land use decisions and accept responsibility for its management selection. If the decision is appealed or challenged through litigation, the Forest Service must only prove it made an informed decision. (Business, Denver, CO - #A29112.12120)

**RATHER THAN CONGRESS**

The management for roadless areas should be maintained and managed by local forest service personnel under a code adopted by the Forest Service and not Congress. (Individual, Spring City, UT - #A25950.25240)

**RATHER THAN POLITICIANS**

This continues to be an issue, which will impact Americans for centuries to come. Roads are necessary often become pathways of destruction for the forests. There continues to be individuals who destroy forest property wantonly or harass game or poach it. Careful consideration is essential. Political gesturing does not help. Please allow the Forest Service to make the decisions, not a lot of politicians. (Individual, Ventura, CA - #A7814.12120)

**RATHER THAN THE PUBLIC**

We would like to emphasize that gathering viewpoints of all interest parties does not relieve the Forest Service of its duty to make management decisions based on what's best for the land and its inhabitants within the current framework and Congressional direction. Gathering comments from the public should in no way resemble or encourage a quasi-voting system. The direction for managing our nationally owned forests is given through our elected officials in Congress and managed by the Administration. The general public is not responsible or qualified to make decisions regarding these lands. (Business or Association, Portland, OR - #A19004.15150)

Competition for competing priority uses will continue to be an integral part of the management of the National Forests. This is proper, but the Forest Service must remember that in the end they are the agency that must make the decisions and implement the actions. Abrogating that responsibility based on input letters, polls, etc. is neither proper nor ethical. The closer to the action the better the final decision will be, which speaks volumes for delegating the decision to the local agency leadership provided they decide within the confines of approved policies and programs. (Individual, Seeley Lake, MT - #A8075.15160)

It is my impression that the Forest Service has very good skills in carrying on open public processes, but then has difficulty reaching and implementing decisions. Perhaps there needs to be a clearer delineation between the role of the public in commenting and the role of the Forest Service in deciding.

Unfortunately, that is precisely what we all thought the early NFMA planning regulations did, yet here we are today. (Individual, Spokane, WA - #A17819.15161)

#### **BECAUSE IT HAS A DUTY TO APPLY ITS EXPERTISE**

The agency needs to take a leadership position in managing the forests. The Forest Service has tremendous expertise in managing natural resources, and it has a duty to apply that expertise. Recently, the agency has explored various roles for itself in forest management, including those of facilitator. From the ski industry's perspective, it is crucial the Agency takes a leadership role in the management of NFS lands, whether it is at a planning or site-specific project level. The agency is not merely a participant in the process, it has a statutory duty to provide outdoor recreational opportunities to the public under NFMA, the Multiple-Use Sustained Yield Act, and the National Forest Ski Area Permit Act. As we witness an increase in involvement (in our approval processes) from other federal agencies with little or no experience in providing recreation, the leadership of the Forest Service becomes even more vital. (Permit Holder, Hood River, OR - #A13230.12120)

#### **AS PROFESSIONALS, RATHER THAN REFEREES BETWEEN COMPETING INTERESTS**

Forest policy should not be made by popular vote. The Forest Service has asked for substantive comments to help with decision-making on this issue. We expect you to manage our public lands using the best available science and substantive public input. We expect you to decide as professionals on the correct course to take and then take it. You are not referees between competing religions or philosophies. You are professional land managers and we expect you to go out and manage the land. (Business or Association, Coeur d'Alene, ID - #A22058.12120)

#### **BY DEVELOPING UNIFORM DIRECTION FOR THE PROCEDURES TO BE USED IN ROADLESS AREA MANAGEMENT DECISIONMAKING**

There must be regulations that aid Forest Supervisors and the plan revisions team that provide a consistent procedural approach to Roadless Area management.

The final rule of 1/12/01 erred in being a "decision document", unilaterally prohibiting certain activities in Inventoried Roadless Areas. The new procedural regulations should avoid making decisions and instead give uniform direction for the procedures to be used in making decision relating to Inventoried Roadless Areas. (Organization, Chesapeake, VA - #A11804.10130)

#### **BY CONDUCTING LARGE REGIONAL MEETINGS OF FOREST OFFICIALS TO DECIDE THE USE OF ROADLESS AREAS**

Regarding your second issue, that of working together, I offer no suggestions for solutions, but I do say that while small committees would seem to be the most efficient means of deciding issues, they are also prone to corruption or bias. I dare say that issues as important as the use and protection of our roadless areas demand to be treated with great respect and I wonder if large regional meetings of forest officials would be useful in deciding how best to use the areas. Large bodies of diverse, geographically scattered members would certainly be harder to corrupt or bias and would yield more productive discussions. (Individual, Cambridge, MA - #A11912.15000)

#### **BY ALLOWING EACH NATIONAL FOREST TO ASSUME THE LEAD RESPONSIBILITY FOR DEVELOPING MANAGEMENT PROPOSALS**

As the federal agency which has been charged with the responsibility for the administration and management of all National Forest system lands, each National Forest should assume the lead responsibility through the forest planning process to gather and compile the necessary data in a formant which can then be presented to the general public, elected officials, other state and federal agencies, and other interested groups in an effort to arrive at a management plan that will gain the support of a majority of the various interested participants within the constraints of the various laws and regulations that are pertinent to the area. (Individual, Eagle, ID - #A3368.12100)

#### **BY GIVING THE DISTRICT RANGER GREATER DECISIONMAKING AUTHORITY**

Strengthen the staff and decisionmaking authority of the Ranger Districts. Districts should have the necessary specialists to do the work and know the land, animals, landscapes and the social economic environment with the District. Reaffirm the District as the doing level of the Forest Service and give the

District Ranger greater authority for decision making and carrying out plans. Planning at the District level should generally answer the how to questions using the best science, economic and social information available to do projects. (Individual, No Address - #A26264.12125)

**BY ALLOWING LOCAL FOREST MANAGERS TO HAVE COMPLETE DECISIONMAKING AUTHORITY**

Require the Forest Service line officers to make decisions about each roadless area at the local level after involvement with the public and other appropriate agencies.

We must bring the decisions about which areas should really be roadless and how they will be managed on an individual basis using the forest planning process with all the players involved. (Individual, No Address - #A20465.13110)

When not specified by law, in support of a more localized planning process, all forest plans, environmental impact statements pertinent to timber sales and other projects on a national forest, science based roads analyses and actions which meet compelling needs should be the responsibility of the Forest Supervisor, who should be the Responsible Official, not a higher level of authority. Specifically on the Tongass NF, the Forest Supervisor should be the Responsible Officer regarding determinations to harvest in inventoried roadless areas in order to meet the market demand requirements of the Tongass Timber Reform Act (TTRA). This is the level at which local knowledge is at its greatest. In addition, this returns authority and responsibility to the level where it belongs.

In the administrative process, all appeals of rulings by the Forest Supervisor would be to the Regional Forester who would be allowed to make the final determination. Additional remedies would have to resort to seeking redress in the Federal court system. (Tribal Corporation, Seattle, WA - #A20468.12125)

Most definitely, the activities that should be expressly prohibited are United States Forest Service national direction. Local forest planning professionals should be allowed complete authority to incorporate or exclude activities within such areas, after weighing and considering all public input. Plainly put, professional staff at the local level should have the competency and self-confidence to make these calls. (Business or Association, Cody, WY - #A19163.13214)

**197. Public Concern: The Forest Service should not give local forest managers greater latitude in management decisions.**

Do not give local managers of these federal lands greater latitude in management decisions. Along with what we create, our age will be remembered for what we chose not to destroy. (Individual, Boulder, CO - #A26125.13110)

**198. Public Concern: The Forest Service should insulate local officials from negative repercussions of decisions.**

This perpetual problem is best addressed just the way it was done in establishing the Roadless Area Conservation Rule. The only way to make such national policies work is to insulate local managers for decision-making. If you change the rule every time someone complains or, put the decisions in the hands of local managers who have to live with those who might disagree with the decisions is a guarantee that no rule will work. We have lots of experience with this approach, so perhaps it is time to learn from that experience. (Individual, Sebastopol, CA - #A2990.13120)

The current review is a not-so-subtle effort to return management decisions to local officials, a policy whose consequences are revealed by the scares of 400,000 miles of roads in our National Forests. Experience shows that decisions related to protection of roadless areas should be based on national policy, not the whim of local officials. In fact, the local officials need to be insulated from decisions made in the national interest that might be locally unpopular. (Individual, Sebastopol, CA - #A2990.13120)



**199. Public Concern: The Forest Service should clarify its authority and relationship with Congress.**

The Forest Service should not blur the separation of powers among the 3 branches of government by having Congress validate rules of local forest plan revisions. Congress should set general policy in laws and the executive branch (in this case the F.S.) should implement and operate under those policies, via rule adoption and action. (Individual, Olympia, WA - #A8793.12100)

**200. Public Concern: The Forest Service should clarify the discretionary authority of the responsible official.****AND CEASE DELEGATING AUTHORITY TO THE RESPONSIBLE OFFICIAL WITHOUT REGULATIONS REQUIRING AN EIS AND PUBLIC COMMENT**

Responsible official's discretion for future road decisions are too broad. Coeur supports a management approach that provides for site-specific flexibility. Under this proposal the "Reasonable Official" would have unlimited discretion in determining when additional protections should apply to inventoried roadless areas or when unroaded areas should be placed off limits to future roads. It is also unclear if this discretion of the Responsible Official would be subject to public comment, review, and appeal procedures. Coeur opposes this delegation of authority to the Responsible Official without clear regulations in place requiring preparation of an EIS, and opportunity for public comment. (Business or Association, Juneau, AK - #A23080.12125)

**201. Public Concern: The Forest Service should adhere to its agency mandate.**

Forest Service should have a mandate that was part of their creation and the winds of political opposition should not sway that mandate, if not in fact created as of yet, one should be created and never swayed by **any political force**. Compliance with mandates of agency could be used as defense in litigation if approved by Congress. Each Federal Agency has a mandate and should not be used to provide more for one agency such as Forest Service Land being conveyed to Wilderness Designated Areas. Preservation works both ways. (Individual, Lacey, WA - #A17762.15160)

***The Legislative Branch*****202. Public Concern: Congress should manage federal lands.**

For several years the public has been pushed into one plan after another, one battle after another . . . all rulemaking should be suspended until one grand plan that incorporates and encompasses the entire process is created. Such a rule should then be brought before Congress to become law, such as the Federal Land Management Policy Act. Rulemaking is a job for our elected officials who truly represent the people. (Individual, Sun Valley, NV - #A30102.10110)

Federal land in general and the roadless issue in particular should be decided on a federal level in Congress where all people from all states are represented. To allow federal land use policies to be dictated by local and state governments usurp our rights as citizens to have national issues decided democratically. (Individual, Kalispell, MT - #A26974.13120)

I believe that an act of Congress should be required to designate future roadless areas or implement any sweeping changes to the public lands use policy. (Individual, Mayfield, UT - #A6629.12120)

An extensive collection of comments have already been provided on this subject to the Administration concerning this matter.

Since President Bush and special interest groups evidently disagree with this Record of Decision (published as part of the final rule, 36 CFR Part 294, Special Areas; Roadless Area Conservation, on January 12, 2001 at 66 CFR 3244), this matter should be handled by a Congressional Subcommittee for review with legislation designed for a vote. (Individual, Bethel Park, PA - #A29859.12130)

This initiative goes against the core mandate of the Forest Service, to manage forests. This initiative is not the way public land policy has been made in the past and should be made today. The best way to get the issues aired is through hearings headed up by our elected representatives, such as in a congressional debate over a wilderness bill. Otherwise the Forest Service becomes the mere political plaything of pressure groups and environmental extremists. (Organization, Missoula, MT - #A28141.12100)

#### **TO ALLOW INPUT FROM CONSTITUENTS**

Congress should be involved in any Roadless plan so the people the Congressman represents can have input. (Individual, No Address - #A457.12130)

#### **TO ADDRESS LOCAL CONDITIONS**

Forest planning should only be done through elected representatives using constitutional principles. Our representatives should direct you what to do—not vice versa. The local representatives should be the ones to determine local conditions where possible. I, or my proxy (local Representatives and Senators) should not have a say in what is done in Vermont any more than Vermont should have a say in what is done here. (Individual, Ogden, UT - #A494.13110)

#### **TO ALLOW A CHANGE IN MANAGEMENT DIRECTION WITH EACH ELECTION, AND TO END THE PRESENT STALEMATE OVER ROADLESS AREA MANAGEMENT**

Designation of these Roadless Areas is a POLITICAL decision. It is not dependent on the physical or biological characteristics of the site. Therefore, I feel that the Forest Service should identify the areas that meet whatever criteria are established for Roadless Areas, display the resources of the areas evaluate the environmental effects of designation of the area and have the local Congressman designate the area establishing whatever management direction they feel is appropriate. If there is enough dissatisfaction within the Congressional District the next election can address the issue. In this case the agony of an unpopular decision will only last for two years [with] the local community. The Congressman can be defeated in the next election and the process can be redone. As it is now we seem to be in an eternal stalemate with no end in sights. (Individual, Olympia, WA - #A278.12100)

#### **TO MAINTAIN CONSISTENCY IN FOREST PLANS**

We need long-term funding and infrastructure for maintenance, timber stand improvement and prescribed burning. Have all decisions go to Congress for approval, so there is consistency in the plans, unchanging under different administrations. (Organization, Reno, NV - #A5987.17100)

#### **DUE TO THE POLARIZATION OF THE ISSUES**

This effort started as a political effort by President Clinton and VP Gore. It was then passed on to the Forest Service to make it legally proper. Unfortunately, I cannot believe that this issue is ever going to be resolved, either nationally or locally. Agreement is impossible due to the polarization of the issues and there will never be total agreement on how much wilderness or natural area is needed. If a national solution is possible, it should be made by Congress, not by administrative order. (Business or Association, Colville, WA - #A3091.12130)

### **203. Public Concern: The Forest Service should recognize Congress's authority to create, modify, or terminate withdrawals of public lands.**

#### **TO ENSURE THE CONTINUED INTEGRITY OF NATIONAL RESOURCE MANAGEMENT SYSTEMS**

Based on comments made by the Clinton Administration, this plan appears to be a thinly veiled attempt at turning what should be a public process into a political one. In efforts to push the plan through as quickly as possible, both public input and Congressional approval were ignored and denied despite legal requirements. According to the Congressional Record of the 94th Congress-Second Session 1976, House Report NO. 94-1163, pg. 6183, FLPMA reserved to the Congress the authority, "to create, modify, and terminate withdrawals for national parks, national forests, the Wilderness system, Indian reservations, certain defense withdrawals, and withdrawals for National Wild and Scenic Rivers, National Trails, and for the "national" recreation units, such as National Recreation Areas and National Seashores. This will insure that the integrity of the great national resource management systems will remain under the control of the Congress." (Business or Association, Boise, ID - #A20607.12220)

**204. Public Concern: Congress should review all land use policies adopted by the Forest Service.****SO THAT THE PUBLIC CAN HEAR THE DEBATES**

All land use policies adopted by the Forest Service should be reviewed by congress and passed into law through the resolution and not the veto process by congress. It is in this best regard that the rights of the public will be protected and not destroyed by an out of control federal agency or a dictatorial president. It allows the debate to be heard by we the public and it holds our representatives accountable. (Individual, Napa, CA - #A7093.12130)

**205. Public Concern: The Forest Service should make recommendations regarding forest management to elected representatives for their approval.**

USFS plans and recommendations should be made to our elected representatives with clear, concise economically derived choices using defensible, peer reviewed science and management techniques. Our elected officials must then decide jointly with the USFS any significant/recommended management action. . . . The elected officials should have power to determine the priority of various forest projects, be reviewed regularly as to the progress of said projects, and determine whether a project shall proceed or not. (Individual, Libby, MT - #A10531.12151)

**206. Public Concern: The Forest Service should submit forest plans to a local vote, then submit voter-approved plans to Congress for approval.**

Forest plans should not prevent resource development or place unnecessary burdens on mining, timber harvesting, or recreation. Forest plans should be voted on by voters in the local jurisdiction, then the vote-approved plan submitted to Congress. (Individual, Albuquerque, NM - #A10497.25000)

***State, County, and City Governments*****207. Public Concern: States should manage federal lands.**

Roadless areas do not necessarily need to be protected by a federal bureaucracy. What would be more useful, in my mind, would be to turn all federal land back to the states and let them manage it in the way they see fit. Communism believes there is an elite group that knows what is best for society and that they—we should just turn everything over to that group and all will be well.

DIDN'T WORK IN RUSSIA. HASN'T WORKED HERE OR YOU WOULD [NOT] BE ASKING THESE QUESTIONS. (Individual, Hamilton, MT - #A94.12150)

In Nevada we have a limited quantity of privately held ownership of lands. Consequently, we are sometimes “dictated to” by Federal edicts. I believe that individual States representing the people in their states should determine the use of those public lands within their boundaries. (Individual, Carson City, NV - #A1065.15130)

I believe that each state should have the ability to make the best decisions regarding the use of public lands that reflects the views of local residents. More local control of public land use by individual forest service managers is needed. The forest service should look at who the decision affects the most. A greater consideration, regardless of the numbers, should be given to local residents, governments and communities when making a decision that affects public lands and resources. A very minimal consideration should be given to the view of those who do not live in the area affected, regardless of the number of comments. (Individual, No Address - #A21353.13110)

Every state should control their own forests. (Individual, Polson, MT - #A1679.15130)

I believe that each state should have the ability to make the best decisions regarding the use of public lands that reflects the views of local residents. More local control of public land use by individual forest service managers is needed. (Individual, Price, UT - #A26952.12150)

## **208. Public Concern: The Forest Service should not allow local government entities to have a role in decisionmaking.**

### **BECAUSE EXCESSIVE LOCAL CONTROL LEADS TO EXPLOITATION-DRIVEN POLITICAL PRESSURE**

If, by “local,” the question means government entities other than federal, these bodies should have no role in decision making. They can and should make suggestions and recommendations, but should have no part in final management decisions. History has demonstrated that excessive local control leads to exploitation-driven political pressure and over harvesting, with little attention to scientific resource management. That characterizes the Forest Service’s past; we should not backtrack to previous days of failed management paradigms. (Individual, Missoula, MT - #A17700.15130)

## **Other**

## **209. Public Concern: The Forest Service should allow various groups to be decision makers.**

### **DISINTERESTED, UNAFFILIATED INDIVIDUALS**

Decisions should be made by a group of individuals whose interests and affiliations include even proportions of all involved groups. Decisions should not be made by single individuals whose biases and personal opinions will sway the decisions. (Individual, Saint Louis, MO - #A629.12000)

### **A COMMITTEE OF EXPERTS**

I am a strong believer that a committee of experts is the best way in evaluating a protection area especially if it is public grounds. Most definitely the local forest agency should be part of evaluation. (Individual, Vancouver, WA - #A389.12100)

### **SCIENTISTS AND OTHER FOREST SERVICE SPECIALISTS WHO WORK WITH THE LAND**

I believe that evaluating the needs of local forests should definitely fall on the shoulders of those scientists and other forest service specialists who work and live with the land. Who else could possibly be better qualified to determine these needs than those who tend to them daily? (Individual, Eagle Creek, OR - #A29956.15169)

### **A PANEL OF APPOINTED PEOPLE REPRESENTING DIFFERENT INTERESTS**

With all the varied values and considerations perhaps the Forest Service should not be the final authority on designating roadless areas but a panel of appointed people representing the different factors. No one is happy with a compromise but at least the Forest Service would not have to take the total blame. (Individual, Ogden, UT - #A2288.12100)

### **A COMMITTEE APPOINTED BY COUNTY COMMISSIONS**

Each forest should have a 9 member “ground truthing” committee out of 18 nominees initially selected by the county commissions in public hearings, apportioned according to population. These people will be elected in the general election, with the person gathering the most votes chairing, paid by the Forest Service to go out on the ground for a year as a team, paid the prevailing wage with benefits, with a deadline to hammer out a package for voter approval. Equip these teams with GIS and other mapping equipment, supply timber cruisers and other forestry/biology professionals on demand, and the authority to make a decision. (Individual, Whitefish, MT - #A13242.15152)

## *Trust and Integrity*

### **210. Public Concern: The Forest Service should maintain high ethical standards.**

The Forest Service would be less torn if it maintained solid standards of resource protection and didn't pretend that the public is its "customer". Too often, biologists, hydrologists, and ecologists are muzzled because the district ranger, supervisor, or regional forester has made a decision based on politics, connections, ambition, or even personal financial self-interest . . . Standards of ethics are badly needed by your agency at the upper levels. (Individual, Victor, ID - #A20625.12230)

Very strong guidance should be provided from the Washington office in regard to ethics and fairness and ensuring that the same is carried out in all land use decisions. Beyond that wide discretion should be given local managers. (Individual, Ellensburg, WA - #A17772.13100)

### **211. Public Concern: The Forest Service should avoid making decisions in secrecy.**

#### **REGARDING MANAGEMENT OF ROADLESS AREAS**

It came as a surprise to Forest Service employees and the general public when President Clinton announced the Roadless Initiative on October 13, 1999. The Forest Service field units were not consulted, nor was their Union consulted as to possible employment impacts. At the time of that announcement, it was not known which areas were being considered.

On May 8, the Draft Environmental Impact Statement (DEIS) was released. Again, the upper management of the FS strictly forbade any release of information prior to that date, and no one knew which areas were going to be proposed, nor what the proposed management of those areas was going to be. Some attempt had been made by local Forest Service offices to determine roadless areas suitable for the President's announcement, but that information wasn't used in the DEIS.

Consequently, the May 8 DEIS came again as a surprise to Forest Employees as well as other publics who were not consulted on which areas were to be considered. The DEIS's inventoried roadless areas (IRAs) were mainly selected by using the RARE II areas that were inventoried over 25 years ago. This past inventory was a result of a report to Congress as an outgrowth of the 1964 Wilderness Act. As a result of that report, about 40 million acres (22%) of the National Forests were made into Wilderness Areas. 54 million acres (28%) of the National Forest lands were inventoried by RARE II, but Congress has elected not to make these into Wilderness Areas and it was expected that these non-designated areas would be converted back to multiple use. But these were the areas that the Administration selected as IRAs in its new Roadless Initiative. (Union, No Address - #A28881.10135)

### **212. Public Concern: The Forest Service should avoid making decisions based on preconceived outcomes.**

We think that keeping open lines of communications, listening to concerns, and responding to them, are the keys to laying a foundation for mutual cooperation on these issues. . . Ultimately, the Forest Service must keep an open mind about the issues before it, and must not come to the table with preconceived positions or outcomes in mind. Many of the concerns raised by the state, local and tribal governments, as well as industry and other organizations, about the roadless rule as published on January 12, 2001, came directly from a belief that the process that preceded that final rule was a predetermined outcome in mind; the ultimate shutdown of the lands, regardless of the impact on localities, and regardless of the health of the actual forests. (Business or Association, Washington, DC - #A6211.15100)

### **213. Public Concern: The Forest Service should keep politics out of the decisionmaking process.**

Please no Politics. This is too important and you're in a position to make a non-political decision. (Individual, Mesa, CO - #A13738.10160)

Over half of our public lands are open to exploitation. Let's be good stewards and protect the other half from this political tug of war. These magnificent forests and the diverse wildlife they support are neither Republican nor Democrat, nor should this be our agenda when deciding its fate. (Individual, Whitefish, MT - #A13343.10160)

The failure of the planning process of TLMP and its revision, comes not in the local planning process, but in the national political arena to summarily dump years of heartache among stakeholders, who bought into the process to develop those plans, in deference to a national political agenda. This political route was chosen over the recommendations and decisions of the local planning effort, which proved that the system in place could work, especially when based on science not politics. (Business, No Address - #A29718.12200)

Decisions on forest management plans and projects must be based on credible science, local knowledge, and professional experience, not on political objectives supported by the counting of pro and con public comments. When I was a District Ranger, I knew of no law, regulation, or policy that directed me to make a decision based upon the number of comments received. Public input and participation in the project was to assure that the planning team and line officer were fully knowledgeable of the project resources and impacts, yes. Counting votes, no! The Forest Service has lost its credibility on this issue. (Individual, Ketchikan, AK - #A28983.12230)

Consider that you spend days reading material from the forest service, took time from your work to attend special public hearings and made great efforts to participate in a specific, concrete way in federal decision-making. Then, as soon as a new President comes in, you find that the rule representing that body of comments is being suspended until it can be completely reconsidered and rewritten, with the clear intent to overturn the integrity and intent of the whole decision. You would feel angry, cheated, and cynical about the words in the new pronouncements speaking about Science and Public Participation when it seems so obvious politics. (Individual, Grass Valley, CA - #A23575.12200)

First, it should be established once and for all time that the national forests and all their resources are permanent reservations which must be managed according to permanent policies that are based on merit and science and not politics. Some of the problems facing the Forest Service and the lands it manages have been created by irresponsible politicians, congressmen and presidents, such as the destructive aspects of logging, mining, and ranching, for over a century. These are our lands, held in trust for us by the federal government in perpetuity. National Forests are not the personal Monopoly board of the president, his flacks in the Department of Agriculture, and the Congress to play with at the whim of special interest groups.

Now we are confronted with an all-out-assault on our public lands, including the national forests, by a president intent on opening the gates for all the extraction industries—oil, gas, mining, and logging, because they ponied up an estimated \$40 million for his campaign for non-election, and now it's payback time. Why should the American taxpayers have to close ranks and fight every anti-environment, pro-mega business president who comes along and assaults our public lands, as we did under the Ronald Reagan attacks? Why can't we enjoy the security of permanent public policy which will manage and preserve our public lands for our enjoyment and generations yet unborn, much as we enjoyed the security of the Social Security Trust Fund before the politicians began dipping into it for their own purposes? (Individual, Loveland, CO - #A9080.12200)

**214. Public Concern: The Forest Service should consider that the way it handled the Roadless Area Conservation Rule has severely damaged its public relations and community support.**

The Roadless Area Initiative is very controversial, both inside and outside the Forest Service. It has magnified the conflict between the urban environmental community and other national forest users. The battle lines are drawn. On one side is the federal administration and every environmental organization;

on the other, every rural state and its governor, every county board, hunters, recreation vehicle users, and logging and mining associations.

The Roadless Area issue is steeped in controversy. The decisions that led to this initiative were not open and transparent. Only one group of forest users was consulted, and the other side was clearly and intentionally locked out of the process. No effort has been made to consult local Forest Service decision-makers. The local Forest Service staff is caught in the middle. Forest Service employees live in rural communities affected by the Roadless Area Initiative. Because of the way this initiative was handled by the federal administration, the level of distrust toward the Forest Service and its employees has reached an unprecedented level. A little bit of consideration by the Administration for Forest Service-community relations could have gone a long way toward diffusing the heated situation. As it now stands, the damage that has been done to Forest Service public relations and community support may take years to repair and rebuild. (Elected Official, Catron County, NM - #A15538.14120)

While Forest issues have often been steeped in controversy, the Roadless Area issue festers like an open sore on the Forest Service horizon. Why did this come about? Largely because of the Administration's manipulative political maneuverings, the issue is lopsided, raw, and offensive. The decisions that lead to this initiative were not open and transparent. Only one group of Forest users was consulted, and the other side was clearly and intentionally locked out of the process. There was no effort by the Administration to gather consensus or agreement. There was no effort to consult with the Union. This is an example of politics at its worst.

We Forest Service employees are caught in the middle. We are here to carry out government policy the best that we can. But we also live in rural communities affected by the Roadless Area Initiative. Because of the way this initiative was handled by the Administration, the level of distrust toward the Forest Service and its employees has reached an unprecedented level. This is very sad, because a little bit of consideration by the Administration for our diverse populations could have gone a long way toward diffusing the heated situation. As it now stands, the damage that has been done to our public relations and our community support may take years to repair and rebuild.

We are asking that a moratorium be placed on this initiative and that all sides initiate honest communication to diffuse this unpleasant situation. (Union, No Address - #A13245.10120)

**215. Public Concern: The Forest Service should consider that local managers felt constrained to identify roadless areas during development of the Roadless Area Conservation Rule.**

The Superintendent of [a national forest] stated in the public meetings in this area, that he had been tasked to come up with some "roadless" areas for the Roadless Initiative project. In response, his staff pulled out some studies from the 1970s in which certain areas had been identified as candidates for "roadless" designation. He further remarked that, as anyone can plainly see, these areas were not roadless in the 1970s and contained more roads now than then. Nonetheless, these were the areas that were designated as "roadless" because he had to designate something due to orders from higher headquarters. As one of his staff later remarked, this whole episode "marked a low point in our careers". Within the designated "roadless" areas were numerous private parcels of land which would require access to be maintained by existing roads. (Q1 and Q5) Also, these areas contain numerous double and single track trails that are open to motorized use. (Individual, Ruidoso, NM - #A17775.45512)

**216. Public Concern: The Forest Service should address the public's suspicions regarding the *real* motivation behind this round of comment.**

I am one of the 1.6 million citizens who submitted written comments on the roadless initiative, and one of thousands who testified at well-publicized meetings. The vast majority of testimony supported keeping inventoried roadless areas roadless, so I question the real reason for this second round. I am suspicious that it may be an attempt to overturn the roadless rule because:

1. The Republican controlled/ Bush administration has been relentless in its assault on every aspect of the environment - air, water, endangered species, preserves, as well as the roadless initiative.

2. The pathetic defense the Justice Department presented, and the absence of Forest Service representation, at the Idaho suit against the Forest Service over the roadless initiative. This was a suit against the Forest Service, which was denied the opportunity to respond, substituting Bush-controlled Justice Department lackeys instead.
3. The government's decision not to appeal this decision.
4. The difficulty in obtaining the questions that format this response.
5. The complexity of these questions, which will discourage participation by citizens in favor of responses by funded extractive and exploitative industries and organizations (e.g. lumber, mining, snowmobile, ATVs). (Individual, Lolo, MT - #A111.10000)

It is evident that the ANPR has a strong bias for abandoning the Roadless Rule in favor of the Forest Service's traditional forest-by-forest planning process. The ANPR failed to mention that the Rule was developed with the most extensive public participation ever in a federal rulemaking process. The ANPR instead just focuses on the allegations in lawsuits that "there was inadequate opportunity for public review and comment on the roadless rule." Does this mean that the administration is completely ignoring the support of 1.6 million people who want to see roadless areas protected? Furthermore, the ANPR questions the legal adequacy of the environmental impact statement for the Rule. The ANPR states, "it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives." But the Bush Administration is utilizing the same type of time line, and places the comment period during the summer months. (Organization, Bozeman, MT - #A15467.14400)

Personally, I feel the current public comment period is redundant and wasteful, considering the fact that the first round of roadless was the single largest public involvement campaign the Forest Service has ever conducted. The reasons given for undertaking this process are vague and misguided. (Individual, Lewiston, ID - #A29569.10152)

## **217. Public Concern: The Forest Service should acknowledge its bias toward commercial interests.**

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or "other resource potentials". It observes that the resource values of roadless areas "vary in importance"; specifically pointing out that roadless areas contain 9 million acres of "productive timberland". These statements exhibit the anti-wilderness, pro-timber mentality that has eroded public trust in Forest Service planning and created broad support for national regulatory protection of roadless areas. If the Forest Service is going to claim some roadless areas have low wilderness values and measure their importance as sources of timber, they should disclose that this is a bias to commercial extraction that is not based on science. (Organization, Spokane, WA - #A18013.12230)

The Forest Service can work with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources by managing all existing roadless areas as nonmotorized, nonlogging, nonmining areas. Then the Forest Service can look at the remaining majority of federal lands and determine appropriate areas that can be reclaimed as roadless and reclaim it. The remaining area would still be the majority of federal lands. Manage that as you have, which means logging, roading, and general exploitation by industry. Industry would still have control of more than half of the public lands. That should be enough. Maybe the remaining roadless lands will be sufficient to provide a minimum amount of healthy forests, wildlife habitat, fisheries, water quality, clean air, and wildlife recreation for humans, while industry plies its trade on the rest of the federal land, as it always has. Wouldn't that be fair? Protect, say 40% of healthy forest by keeping industry and Forest Service "managers" out. Allow the rest to be pillaged as it has been for 40 years. Better yet, put the Forest Service in charge of the industry land and a new conservation-oriented agency in charge of the wildlands. How about it? Shouldn't 60% of the land be sufficient for industry exploitation. I'd make the



trade, right now. How about you? Oh, I see. You want it all. Well, therein lies the rub. Until you realize that greedy little side of your agency and industry, then do something about it, you'll never get people together. (Individual, Libby, MT - #A14047.10150)

My concern is that the timber industry provided a lot of input to these questions to guide the discussion away from ecological values and toward economic values. My concern is that you are disregarding 1.5 million comments in favor of preservation. My concern is that this administration could care less about our planet and only want big profits for rich people, at any cost. My concern is that the outcome of this discussion is a foregone conclusion and you are going to sell out. (Individual, Corvallis, OR - #A2352.12210)

**218. Public Concern: The Forest Service should avoid asking the same questions until it gets the desired answer.**

I have read your questions regarding the proposed changes. I think another question is far more important, and that is: **Why are you second-guessing a plan that was established based on two years of effort, over 600 public hearings, and the input of 1.6 million people?**

The current roadless rule is an excellent plan, with enormous compromises already built in to come as close as possible to satisfying all factions. It was established based on a long, arduous, and bipartisan process. For you to turn around and say "oh, a few of us don't like the results so we will try again" is highly offensive to all who worked for, and supported, the bipartisan compromise currently in place.

My father got a degree in chemical engineering just before the start of World War II. During the war he worked in a plant which made tetraethyl lead, the gasoline additive which of course was crucial during the war. Part of his responsibility was helping to monitor the ambient levels of lead in the factory (since of course lead is a poison). When the numbers his group obtained were too high, managers above them responded quickly-by saying "go back and try again". He was sufficiently disgusted to leave the field of engineering; after the war he got his Ph.D. in chemistry and taught at the University of Florida for the rest of his life.

Your proposal to modify this carefully considered, well crafted plan reminds me of those managers who by fiat overturned the careful measurements of competent engineers. (Individual, Greensboro, FL - #A18256.10152)

**219. Public Concern: The Forest Service should work to regain the public's confidence.**

It seems the open meetings and comments in writing are very good ways of communication. My concern and the concern of others is whether or not the federal gov. pays attention to what we say and what the people want. There have been way too many times, especially under the Clinton administration, that the government just did what ever it wanted, regardless of what the vast majority of people said. Somehow, confidence must be regained so that we the people feel like we are actually being listened to. (Individual, Stevensville, MT - #A17902.10131)

**THE FOREST SERVICE CHIEF**

Following are the comments of the Park County Environmental Council in support of the Roadless Conservation Rule signed into law in January of this year. As requested in the process laid out by the Bush administration's new Forest Service, our group presents the following answers to the questions composed, presumably by your staff. Though most of these questions have been more than adequately addressed in the FEIS produced by your predecessor, and these questions, we believe, are an attempt to confuse the public and provide a tactical avenue for delaying progress in protection of the public's last remaining roadless lands, we nonetheless will complete this task. Our group is disappointed in you, Chief Bosworth, for your blatant retreat from your respected position as a steward of the land to your new role as political puppet. Our group has difficulty with your apparent lack of integrity and we can only ask, what or who has co-opted you? The public is not as ignorant or naive as many in your administration seem to believe and this episode will only add to the discredit that accumulates daily from actions taken by your administration. We ask that you make every effort to redeem yourself and restore

our confidence in you by supporting the rule as it stands. (Organization, Livingston, MT - #A19219.12230)

#### **BY MAINTAINING ITS OBJECTIVITY**

Everyone must have equal access to the process and equal opportunity to express their views. We hope the back-room deals at the national level, which marred the initial rule making, are things of the past. The word “collaboration” carries a negative connotation, one of cozy deals and distorted information favoring one point of view or another. Decision makers must maintain their objectivity and assure a lack of bias in data collection and its use. The image of your agency has been badly tarnished by real or perceived coziness with special interest groups. The NEPA process was corrupted in the rush to complete massive national initiatives before the last administration left office, becoming a means to confirm decisions already made. The Forest Service as an agency will have to prove its professionalism before re-earning the public’s respect, especially at the local, adjacent community level. (Business or Association, Olympia, WA - #A3619.12120)

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#### **BY BEING HONEST ABOUT THE ROADED/UNROADED STATUS OF AREAS**

Unfortunately, in our community, the Forest Service and their representatives have lost all credibility on this issue. Why? Because the most basic rule in public relations is to tell the truth, and the Forest Service representatives did not tell the truth.

While there are many instances of this, the two key untruths told by Forest Service representatives were that: 1) Certain areas that are designated “roadless” in fact have roads, and some have been clear-cut at least once and 2) Areas improperly designated as “roadless” which in fact have roads, could be reclassified as “roaded” areas. This was fundamentally dishonest of the Forest Service and its representatives.

Several of your questions concern how the Forest Service can best work with often time competitive users of Forest Service administered lands. You can only do that by maintaining your integrity as a professional organization. Otherwise you simply are a pawn of whatever happens to be politically correct at the moment, a servant of those who believe that their “end justifies the means.”

To regain your integrity on this issue it is necessary to acknowledge that some of the “roadless” areas were improperly classified, and rectify the situation. If you have integrity, with time you will be able to resolve the other problems, even if it sometimes means telling people things they don’t want to hear. But without integrity you cannot get the support that you need from the reasonable majority of people who are on the middle ground of most issues. (Individual, Markleeville, CA - #A15429.12230)

There is a great deal of frustration in North Dakota because the rulemaking and forest planning process has failed to honor the promises made about collaborative decisionmaking. Instead, the western counties face a shrinking economic base, threatened by cuts in livestock grazing, unavailability of land for future energy development, denial of royalty rights, and continued conflict over what the United States originally promised. If the agency has predetermined the outcome, no amount of process is going to make the decision any more valid. Moreover, we do not believe that process will address the flaws nationwide based on the experience in North Dakota. Unless and until the Forest Service is willing to reconsider the roadless policy by recognizing these areas are developed and have roads, then the Forest

Service is condemned to continue to make the flawed decisions and to further alienate the public that the agency allegedly serves. (Elected Official, McKenzie County, ND - #A27737.12200)

**BY CONSIDERING PUBLIC CONCERNS AND MANAGING USERS AND RESOURCES FAIRLY**

The Resources Planning Act/National Management Act provides the US Forest Service with many opportunities. Sadly, they have been squandered. The fault rests mostly on the shoulders of the Service itself, which has failed to provide responsible leadership.

The US Forest Service was once one of the most highly regarded of federal agencies. In the recent issue of High Country News Publishers, Ed Marston writes “The Forest Service organization, that has been publicly humiliated for the last 15 years by environmentalists, by the courts, by industry and by Congress. It is an agency that has lost to those interests the only power that counts: The power to manage its 300,000 square miles of land.” How the US Forest Service manages roadless lands over the next twenty or so years will significantly determine whether stature rises or humiliation continues. And perhaps whether the US Forest Service continues to exist at all.

Some times spent generating this response and I ask that you give due consideration. I have been to a few dozen events where a Forest Service executive remarked that everyone seemed angry with the Service or disagreed with them and this indicated to the forestry agent that they (USFS) were doing something right. Can you imagine a bank executive saying, “Since all of our customers are angry with us, I must be doing my job well.” A common response to public input is something like this. “Well, everyone has an opinion, you know.” I always take that to indicate the government agent making the comment ignores good suggestions along with bad. The reality is worse, of course. The United States Forest Service has been inclined to ignore good advice and follow bad. (Individual, Colville, WA - #A20889.12230)

The other day I was talking to an older, local community leader in our rural area. We don’t agree on resource management. But we were talking about how federal land managers insisted that old growth stands of timber needed to be converted to young, vigorous stands of timber just a decade ago, and now those same managers tell us it is important to protect old growth. We both agreed those managers were either wrong then or they are wrong now and those forest managers don’t have much credibility. We don’t take what the US Forest Service says very seriously.

How can you take an agency seriously when they want to charge owners of the lands five dollars to take a three hour hike and a dollar and thirty five cents for a rancher to graze a cow with a calf for a month? How can you take an agency seriously when they tell you to camp two hundred feet from a stream and allow cattle to stomp down the same stream banks and crap in the stream? The majority of Forest Service campgrounds are perched right on the shores of lakes, rivers and streams. How do you expect anyone to take what you say or do seriously? (Individual, Colville, WA - #A20889.12230)

**220. Public Concern: The Forest Service should honor existing agreements between citizens and the government.**

Existing agreements between citizens and government should be respected at all costs. Where such agreements have been violated by the government, citizens should be duly compensated. A government, which violates either contract or Constitution, is by definition a tyranny. It cannot stand, and with its demise will die all the good it had hoped to accomplish. (Individual, Modesto, CA - #A14006.12200)

**221. Public Concern: The Forest Service should be abolished or replaced.**

There is precious little real, on the ground management being done anymore. In fact, insofar as I can see, even the so-called professionals at the upper echelons of administration—including Forest Supervisors and District Rangers are so deeply imbedded in the protectionist movement that they can no longer see the viewpoints of the rest of us, and worse, they don’t care. When a Forest Supervisor can tell me to my face that a recent fire in an area of over 50,000 acres left individual canyons without so much as one seed tree within 10 miles, but that he couldn’t manually reseed the area because of various restrictions placed on him by “higher authority”, and then immediately turn away and vociferously support the roadless plan of Clinton’s, then I think either he is the world’s largest hypocrite, or he is particularly

stupid, and in either case should be replaced. Perhaps the problem is with the forest Service itself . . . perhaps it should be replaced, or simply abolished. (Individual, Pendleton, OR - #A666.12230)

## Local vs. National Decisionmaking

### Summary

**Local (Forest level) Decisionmaking** – Some respondents ask the Forest Service to define what and who comprises “local forest planning.” These people state that virtually all national forests span numerous counties, local jurisdictions, and in many cases, state boundaries. Thus, explains one individual, the ramifications of decisions made at the ‘local’ level do not remain at the local level. This person explains that the cumulative impacts of site specific decisions are far reaching and can not be made on a site by site basis without taking into account the impacts on all communities and the environment, not just the local one.

Some respondents do not find the distinction between local and national decisionmaking problematic and advocate that decisions be made at the local (forest) level (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Do Not Implement the Roadless Area Conservation Rule*). Individuals, businesses, lands rights organizations, recreational motorized organizations, industrial associations, special use permit holders, and county commissions offer a number of reasons why decisionmaking should occur at the local level. They assert primarily that it is not the role of the Washington Office to micromanage resources; that local decisionmaking is required by the National Forest Management Act; that only local decisionmaking can adequately respond to the unique conditions and needs of different areas; that local residents have the most knowledge about the resources and the most to lose if a bad decision is made; and that resources available in roadless areas are vital to adjacent communities. Following this line of reasoning, some respondents state that individual national forests should be allowed to opt out of the Roadless Area Conservation Rule.

Others comment that no national forest should be exempt from the Roadless Area Conservation Rule. These respondents question the value of “local expertise” as opposed to that of professional Forest Service specialists, and ask how local expertise will provide more reliable information than was gathered for the Rule.

**Local (Forest Level) Decisionmaking with National Guidance** – Most who address the issue of local (forest level) decisionmaking with national guidance urge the Forest Service to ensure that local forest planning adheres to the Roadless Area Conservation Rule. Others state that the Forest Service should establish general guidelines for the consideration of roadless areas while allowing exceptions as approved by the Secretary of Agriculture; while allowing forest supervisors to nominate areas suitable for a roadless designation; while allowing forest plans to allocate lands; while allowing forest plans to address specific forest activities that are both feasible and sustainable; or while allowing forest plans to determine the relative merits of their roadless areas and need for roads.

**National Decisionmaking** – Respondents believe that decisions regarding management of roadless areas should be made at the national level (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Implement the Roadless Area Conservation Rule*). These respondents point out primarily that national forests are national resources “and should likewise be governed by a national policy;” that decisions

should be in the best interest of the whole country; that a uniform policy is needed; that local interests are too often tied to profit of local interests and do not represent the collective will of the state or the nation; and that the forest planning process has failed to adequately protect roadless areas. According to one organization, the administration extols the local forest planning as a highly collaborative process but does not point out perceived past failures of the forest planning process to protect roadless areas, as shown by allowing roads to be built in the remaining roadless areas. According to some, management decisions should be made *only* at the national level.

### *Local vs. National Decisionmaking General*

#### **222. Public Concern: The Forest Service should review the Western Governors Association 1999 Policy Resolution, *Principles for Environmental Management in the West*.**

##### **FOR GUIDANCE IN RESOLVING THE TENSION BETWEEN NATIONAL AND LOCAL FOREST PLANNING**

Strategies and decisions regarding protection and management of inventoried roadless areas should be made during local forest planning. However, consistency with regional assessments and plans is important. This and the following nine questions all seem to reflect on the tension between national and local forest planning. For a template of how to resolve this tension, we recommend you closely review the Western Governors Association 1999 Policy Resolution *Principles for Environmental Management in the West*. (Business or Association, Washington, DC - #A17887.13110)

#### **223. Public Concern: The Forest Service should tailor the level of decisionmaking to the scope of the issues.**

##### **NATIONAL LEVEL DECISIONMAKING FOR ISSUES OF NATIONAL IMPORTANCE, FOREST LEVEL DECISIONMAKING FOR ISSUES SPECIFIC TO THE FOREST, AND SITE-SPECIFIC DECISIONMAKING FOR PROJECTS WITHIN THE FOREST**

EPA believes that certain undeveloped areas such as inventoried roadless areas and unroaded areas should be evaluated and conserved at several scales. EPA supports the hierarchy of land management decision making principles outlined in the National Forest Management Act (NFMA), i.e., issues of national importance are best resolved at the national level; issues that are primarily of importance only to a specific National Forest are best resolved on a Forest-by-Forest basis; and issues that pertain to a particular project within a single National Forest are best resolved on a local, site-specific basis. (Federal Agency, Washington, DC - #A28843.20201)

The Forest Service must match the public involvement process to the scope of the issues. Where issues of national import, such as the conservation of wild areas such as embodied in roadless areas, are on the table, the public involvement process must be national and open to all citizens. Where the issues are primarily of local concern, such as the availability of firewood, then the public involvement process is best targeted to local interests. (Individual, Corvallis, OR - #A8027.15110)

### *Local (Forest Level) Decisionmaking*

#### **224. Public Concern: The Forest Service should define what and who comprises “local forest planning.”**

##### **BECAUSE VIRTUALLY ALL NATIONAL FORESTS SPAN NUMEROUS COUNTIES, LOCAL JURISDICTIONS, AND IN MANY CASES, STATE BOUNDARIES**

Virtually all national forests span numerous counties, local jurisdictions and in many cases, state boundaries. Considering this, defining what, or who, comprises “local forest planning” is vague at best

and, to be accurate, misleading. The expression “local forest planning” is an arbitrary distinction and an inherently discriminatory one as well. How is “local” defined? Everyone within 50 miles of the forest lands to be managed? Within 100 miles? Within a day’s drive? Or should such a definition be based on forest use? If so whose use gets priority (i.e. logging versus dispersed recreation)? Obviously attempting to weight forest planning towards “local forest planning” is discriminatory at best and subject to legal challenge should management of our public lands be based on such. (Organization, Richland, WA - #A962.13100)

The term “local” in the context of forest planning must be clearly defined. What exactly constitutes local planning when it involves a national forest that extends across county and state boundaries? The ramifications of decisions made at the “local” level do not necessarily remain at the local level. Here in the northwest, past decisions on logging, roadbuilding and grazing in the national forests have had an impact on communities well outside of national forest jurisdictions in terms of their ability to obtain clean water or to pursue commercial or recreational opportunities. Decision on the national forests in the northwest have directly affected the commercial and sport fisheries in areas as far away as northern British Columbia and Alaska. The development by the National Marine Fisheries Service (NMFS) of the 4H rules for the watersheds of the northwest is a testament to what can go wrong with the Forest Service’s version of “local” planning. (Individual, Anchorage, AK - #A20934.13110)

## **225. Public Concern: The Forest Service should make management decisions at the local level.**

I do not want freedoms restricted by the government or any other outside influence. If decisions are going to be made regarding my Local Forest I want them made with the input of the local people and not some Washington Bureaucrat. (Individual, Anaheim, CA - #A337.13110)

### **BECAUSE IT IS NOT THE ROLE OF THE WASHINGTON OFFICE TO MICROMANAGE RESOURCES**

Allow District Rangers and Forest Supervisors to make decisions for the public lands entrusted to them and support their actions that are in line with Gifford Pinchot’s maxim of ‘Greatest good for the greatest number in the long run’. The Forest Service has some of the world’s best natural resource specialists working at the District and Forest staff level. Allow them to use their knowledge, skills, and experience to make decisions on what is best for the land.

The role of the Washington Office should be to set broad policy and management philosophy, not micromanage the resources or look over Ranger’s and Supervisor’s shoulders. On-the-ground decisions should be made by people on the ground.

Trust Forest Service employees. Support local decision making. (Individual, Westwood, CA - #A360.13110)

They should be managed locally. If the local USFS personnel determine that a new road is necessary to protect the forest or create a significant benefit to the community, then why should a national directive that has not taken into consideration such issues be in the way? There is no way that the cumulative effects of this plan have been taken into account for every single area designated. (Permit Holder, Vadito, NM - #A20142.13110)

Other Concerns: The Forest Service must empower local managers and specialists to craft solutions to their unique challenges on individual sites or units. Site-specific or project-level decisions on any scale must not be initiated from the agency’s Regional or Washington Office. (Organization, Twain Harte, CA - #A13434.13110)

The Forest Service must allow local managers to craft solutions to their unique challenges on a site-specific basis. What works on one forest may not work on another. Project level decisions should not be constructed or dictated from the Forest Service Washington Office. Forest planning and regulatory processes should be given back to the professional in the agency. Planning and Regulation should not

become a political popularity vote counting process. (Organization, Lake Isabella, CA - #A20945.13110)

**BECAUSE NATIONAL MANAGEMENT WILL NOT RESULT IN PROTECTION OF THE VALUES PEOPLE REALLY CARE ABOUT**

During the last few years we have seen a steady erosion of the local decision making authority and responsibility. This has resulted in centralizing the decisionmaking authority at the National level. This has impacted the local unit's morale and reduced the local accountability. We feel that it is critical to return to a decentralized decision making process, at least to the National Forest level.

Without a comprehensive and locally based process, including decision making, monitoring and accountability, the future decisions concerning National Forests management will not result in the protection of the values people really care about. We encourage you to reestablish local authority and provide a meaningful process that will allow those that are most affected by resource decisions on public land to be meaningfully involved. (Business or Association, Colville, WA - #A3091.12125)

**TO ENSURE THAT GOVERNMENT ACTIONS DO NOT INTERFERE WITH THE OBJECTIVES OF LOCAL PLANNING EFFORTS**

In many communities adjacent to national forests, the good faith effort of local people to develop plans for the management of natural resources, land use and development zoning are inseparably tied to the uses occurring on Federal lands. Local communities as well as the individuals that make up the community develop long term financial and cultural commitment based on their local plans and authorities. Therefore, the USFS should conduct and coordinate all planning at the local forest level with local planning entities whether State, Local or Tribal to assure that government actions do not interfere with or disrupt the goals, objectives and management actions specified in local planning efforts. (Organization, Murphy, ID - #A18024.15111)

Under the Forest and Rangeland Renewable Resource Planning Act, land use planning on the National Forest was to give major consideration to their impact on plans developed by local governments, including the impact of the Forest Service road network on the local road system (See Senate Report No. 93-686 (1974). Since the closure, and lack of reconstruction, of Forest Service roads has the potential to affect local government plans and roads systems the specific impacts on the governments prior to adoption of the proposed action. (Elected Official, Douglas County, OR - #A11811.15130)

More local input by the people affected, so local industries are not closed by some rule made in the higher offices of the Forest Service. These people still receive their money no matter what stupid decision they make. A little accountability would go a long way in defusing any disagreements. (Individual, Fallon, NV - #A21953.13110)

**BECAUSE IT IS REQUIRED BY THE NATIONAL FOREST MANAGEMENT ACT**

Maximizing the multiple use aspects of the forest is mentioned numerous times throughout the NFMA, and it is the sole purpose of 16USC532. Local forest planning is the only way in which the mandate of the NFMA can be met adequately. At times this may involve decisions concerning maintaining the integrity of a roadless area, decisions which can only be made locally because each forest has its own unique blend of local interface, history, culture, and the problems associated with those characteristics. (Individual, Denver, CO - #A5433.20201)

The NFMA makes the land and resource management plan (forest plan) the focal point for management of each National Forest. After adoption of the forest plan, all "resource plans . . . and other instruments for the use and occupancy of National Forest system lands shall be consistent with the land management plans." 16 U.S.C. 1604(i). If a proposed "resource plan" is not consistent with the forest plan, the NFMA requires analysis of a proposed plan amendment and the opportunity for public comment before the plan amendment can be adopted and implemented. *Id* [Section] 1604(d) and (f)(4). Forest plans are the engines that drive the forest management process.

The NFMA similarly recognizes the need to consider relative values and local conditions. In the NFMA, Congress concluded that it was “unwise to legislate national prescriptions” for all national forests because of the “wide range of climatic conditions, topography, geologic and soil types,” and different local perspectives on appropriate land uses in a particular National Forest. S. Rep. No. 94-893, at 26 (1976). This prohibition against national prescriptions also extends to Forest Service actions:

The Committee bill directs that guidelines be developed by the Secretary of Agriculture for the land management planning process. While planning guidelines will apply at all levels, *there is not to be a national land management prescription*. The general framework for the plans and appropriate management direction would be established on a national basis . . . . The *detailed application of this framework and direction would be reflected in individual plans* . . . . The Committee believes that in the development of land management plans, the land manager must pay particular attention to the identification of land suitability and capability for various types, level, and combinations of resource use . . . and special resource relationships where hazards exist for the various resources [e.g., forest health issues]. S. Rep. No. 94-893, at 35. (emphasis added). (Business or Association, Spokane, WA - #A17351.20201)

Chief Bosworth, it is our contention that: (1) this ‘roadless discussion’ is intrinsically and legally inappropriate because it is intended to override the determinations of existing forest plans which have their legal basis and credibility under the National Forest Management Act. (2) As you brought out in your advance notice of proposed rulemaking the scale of this discussion is infeasible and duplicative of the forest planning process.

It would serve the public’s best interests for the United States Forest Service to lead the public back to the legal framework with which such values/topics can be legally considered, i.e. forest plan revisions. (Business or Association, Cody, WY - #A19163.13110)

#### **BECAUSE DIFFERENT AREAS HAVE DIFFERENT CONDITIONS AND NEEDS**

I feel that local forest plan should be given the biggest role in evaluating management of inventoried roadless areas. Every section of our country, state, county or area has its own “little signature”. How can someone in California tell us in Chester South Carolina how to protect our forest. We seem to do a great job here because we have not had the forest fires that California seems to have. Even a state as close as Florida has problems with fires. These states must have problems that do not exist in SC, or they would be doing a better job. (Individual, No Address - #A57.13110)

The disposition and management of inventoried roadless areas should be determined in forest plans on a unit-by-unit, site-specific basis. These areas and their resources are vital to adjacent communities. A full range of alternatives must be developed for each unit and carefully examined under the NEPA process. Some may be best managed as roadless in perpetuity or recommended for wilderness designation, while others should be developed for commodity production. A myriad of factors must be considered, such as fuel loading, forest health, proximity to private or other public property, size, terrain, soils, watersheds, minerals, wildlife and fisheries. Each unit is unique and needs a tailored prescription. While rules may guide how the determination is to be made in a broad sense, the decisions should be made in the forest plans. (Individual, Lewiston, ID - #A2872.13130)

It is inconceivable that anyone, especially professional foresters, would try to write a single EIS to address all the diversities of the various areas included in the roadless policy. A separate EIS should be written for each area. A committee in one central location cannot possibly cover all concerns and diversities of the many separate areas included in the roadless policy. (Individual, Miami, AZ - #A880.13230)

It is agreed by all that we need to protect our forest and make sure we address forest preserve part of our forest for the animal habitat and water quality. I believe this can be done best on a local level. Each community has their own set of standards or rules that need to be followed. The same applies to other countries. What may work for one may not work for the other? There standards or rules . . . why would



we agree to give someone or a group total power to make decisions for us that affect us but not them without a fight? (Individual, Argonne, WI - #A11688.13100)

Federal policy-making must recognize that not all “inventoried roadless” areas are of equal quality. Much time has passed since the 1979 RARE II inventory, and conditions in many areas once considered roadless—for purposes of the 1979 inventory—have changed. Likewise, we have seen dramatic changes in the public’s use of NFS lands for diverse outdoor recreation. Given these dynamics, the Association believes the local forest planning process is the most appropriate means for making roadless protection decisions. (Permit Holder, Hood River, OR - #A13230.13110)

#### **BECAUSE LOCAL PLANNERS HAVE A BETTER UNDERSTANDING OF LOCAL NEEDS AND CONCERNS REGARDING LAND MANAGEMENT**

I feel strongly that local land-use managers should be able to make the decisions on whether to allow new roads and facilities to be built on public forest service lands. The federal government should have guidelines and rules set for reviewing and making sure that environmental concerns are resolved, but the decisions on how to manage the land should be made locally. Local governments and managers have a much better understanding of the needs, issues, and concerns that are involved with land management. Therefore the decisions should be made by those who are the most informed and knowledgeable with the issues. These decisions should undoubtedly be made by the local authorities and experts. Please don’t let local issues be decided by uninformed bureaucrats in Washington that are only concerned about what their constituents from their states want. Decisions made on land usage have major impacts on the lives and lifestyles of those in the local area. Let the local experts be the ones making the decisions. (Individual, Houston, TX - #A4613.13130)

Local Forest Planning should be paramount in evaluating such areas. We’ve gone through RARE I and RARE II and spent a tremendous amount of money doing so; then we’ve gone through study after study until no one knows where we are anymore. To make a “cookie cutter” plan for the entire National forest system is absurd. Only local planners can truly evaluate roadless areas for what they are, and should be. (Individual, Pendleton, OR - #A666.13110)

The people of the local area should do the evaluating not the FS [Forest Service], their economy should be a leading factor, is their minerals there, is their timber there, what’s the best way to get at it, how about recreation, a camp ground, a park all these things should be looked at before it is environmentally locked up. (Individual, Baker City, OR - #A1038.13230)

Informed Decision Making. The roadless areas are best planned and the management needs identified by the local offices of the Forest Service. A substantial problem with the present rule is that there is no provision for local Forests to make exceptions when it is necessary. Local public input was limited by the way the information was collected and local problems were not identified or considered. The Rule identified the values to be protected were national in scope, but did not consider the impact on local communities nor was local input considered. The information about local impacts resides at the local Forest offices and was not a part of the decision making process. These local offices have the information on impacts and can acquire local input on the important local roadless issues. They should be allowed to do this job. (Business, Viburnum, MO - #A11695.11110)

I value the decisions made on a local forest service level. They know the areas around them and the people who impact and use the land. Comments should be made to them on a local level and not on a wide scale basis. There are many areas that are inaccessible already. One local canyon was recently locked up. Now, we are suffering many consequences: 1) the local sheep ranchers are unable to get groceries and supplies to their herder. It was impossible to take the camp for a three-month stay, so the herder was forced to live in a tent. Therefore, the grazing rights are currently for sale. This threatens the livelihood of the ranchers. 2) The elk have reached an unhealthy population and hunters are not able to take an animal. It would spoil before they could get it out of the mountains. Now the elk are running

down on the highway. Over thirty big bulls, valued at \$6,000 to \$20,000 each has been killed by motorists. The DWR have had to pay extra expenses to hire help and herd them off the highway each night. 3) A local timber company has had to lay off 20 workers. This was a huge impact for our little rural town since we only have three major employers. Satterwhite had the possibility of becoming the fourth, but now we watch as the beetles continue to destroy our forests and we are helpless to watch. The timber companies were responsible for taking all the dead lumber and also improving our canyon roads. Most of the people who enjoy recreating here are from Salt Lake City and surrounding counties. We don't have the tax base necessary to maintain the roads in each canyon. But volunteers, the National Guard and the timber company have taken care of us. No one in Washington DC is able to know and understand any of the issues or their impacts. (Individual, Las Vegas, NV - #A26123.13100)

It is our opinion that the best form of environmental review is the one that is most closely linked to the area in question. Forest planning issues should always be reserved for the local Forest Supervisor/District Ranger review. Only he/she has the history and background necessary in order to completely review a project for all its merits and/or shortcomings. While we understand that Washington based mandates are more easily established and quicker to implement, they are often times negligent in their ability to foresee opportunities or issues that may potentially arise. For this and many more in-depth reasons, we adamantly oppose any Forest Planning decisions made at a level above the Forest Supervisor's Office. (Business, Twin Bridges, CA - #A8808.13100)

#### **BECAUSE DIFFERENT AREAS HAVE DIFFERENT USE DEMANDS**

While all of the national forests are open to the public, it is also true that forests in different areas have different majority of use demands than other forests in other areas.

As an example, while the forests in upper New York state would naturally have a high usage of backpackers and hikers, the national forests in southeast Texas would see almost no backpacking or hiking. While some forests would draw a high percent of boaters and fishermen, other forests would not be represented by those same type of users.

So, it's almost imperative that each national forest be considered on an individual, and local, basis. (Individual, Mesquite, TX - #A28471.13200)

The only appropriate avenue for considering land allocations on any national forest is through the NFMA-mandated individual forest plans in which all multiple use considerations and social and economic impacts must be considered. The basic premise of a nationwide roads prohibition is counter to the existing Forest Service planning process and its current set of proposed planning regulations. Both the current forest planning process and the proposed planning regulations emphasize local decision-making. The preferred alternative of this proposal is a top-down management decision that forces managers to make decisions based on a national policy that does not reflect local conditions. A perfect example of the need for local decisions is the assertion in the FEIS that "there is currently a trend of decreasing interest by the mineral industry in exploration and development of domestic mineral resources" (p. 3-143). The opposite is true for the largely under-explored Chugach National Forest, yet there is no recognition of this fact in the FEIS or proposal. (Professional Society, Anchorage, AK - #A21707.20201)

#### **BECAUSE A MANAGEMENT CHANGE IN ROADLESS AREAS MAY ADVERSELY AFFECT THE REMAINING AREAS OF THE FOREST**

We question whether changing the management character of the roadless lands outside the context of the forest plan is consistent with the National Forest Management Act, Renewable Resources Planning Act, and the Forest and Rangelands Renewable Resources Planning Act. Since a management change in these areas has the potential to adversely affect the remaining areas of the forest, we suggest that the roadless issue only be addressed in the context of the forest plan. (County Attorney, Grant County, OR - #A17667.20200)

#### **BECAUSE PROFESSIONAL FOREST MANAGERS ARE TRAINED FOR MANY YEARS**

In this political vote-for-your-favorite-forest-use-process, the professional forest manager is being totally ignored. Schooled and trained for many years, these are the people who best know how to manage

forests for multiple uses. Today, over 100 preservationist groups are petitioning to have all motorized traffic banned from the 56 million acres. If that happens, the roadless areas become nothing more than wilderness areas. In wilderness there is no need for management, no need for managers or foresters, no forestry, just lock it up and leave it alone. (Individual, Salem, OR - #A5958.12100)

#### **BECAUSE GREATER WEIGHT SHOULD BE PLACED ON THE GREATER FOREST EXPERIENCE**

A mere counting of “ayes and nays” is not adequate. Perhaps a “stakeholder’s questionnaire” needs to be developed that ascertains how many hours the person has spent in the forest. Is this someone who has spent a lifetime in the forest, through all sorts of public policy fluctuations, or is this a person who spend two weeks in July camping? All opinions definitely need to be heard, but in the final analysis the greater weight needs to be placed on the greater forest experience. (Individual, Emmett, ID - #A110.15110)

#### **BECAUSE LOCAL RESIDENTS HAVE THE MOST KNOWLEDGE ABOUT THE RESOURCES AND THE MOST TO LOSE IF A BAD DECISION IS MADE**

[Rural people] largely understand the relationships between resources and our national quality of life because they grow cattle, farm the crops, harvest the trees and mine the minerals. They are also the people who rely on our national forests for jobs, raw materials and the fun things in their lives. They love undeveloped wild lands and wilderness. However, they also value the variety of recreation opportunities the national forests are capable of supporting, motorized and non-motorized. They understand that our nation needs the valuable products that can be produced from our national forests, such as wood, forage, minerals and water. They understand the importance of an adequate infrastructure to provide access to these forest land-roads, bridges, and trails. Effects of proposals such as this are immediate and devastating to the people who live close to and depend upon the national forests. Please keep in mind this urban vs. rural conundrum when evaluating input. Consider who has the most knowledge about the resources and the most to lose if a bad decision is made. Don’t deepen the divide. (Business or Association, Olympia, WA - #A3619.15100)

#### **BECAUSE LOCAL RESIDENTS KNOW HOW THEIR FORESTS HAVE BEEN USED THROUGH TIME**

The Forest Service is notoriously ahistorical—old cabins with years of history are burnt down without notice, old mine shafts are plowed under and destroyed, seemingly without a thought for the lost human legacy. Managing a natural landscape does not mean ignoring historic use. Local inhabitants know how their forests have been used through time, and their input should weigh heavily for any road closures and new limits on currently roaded areas. (Individual, West Yellowstone, MT - #A1045.15111)

#### **BECAUSE ROADLESS AREAS ARE VITAL TO ADJACENT COMMUNITIES**

The disposition and management of inventoried roadless areas should be determined in forest plans on a unit-by-unit, site-specific basis. These areas and their resources are vital to adjacent communities. A full range of alternatives must be developed for each unit and carefully examined under the NEPA process. Some may be best managed as roadless during the life of the forest plan or recommended for wilderness designation, while others should be developed for commodity production. A myriad of factors must be considered, such as fuel loading, forest health, proximity to private or other public property, size, terrain, soils, watersheds, minerals, wildlife and fisheries. Each unit is unique and needs a tailored prescription. While rules may guide how the determination is to be made in a broad sense, the decision should be made in the forest plans. Whatever the case, it is absolutely necessary that the forest plans be completed in a timely manner. (Business, Lewiston, ID - #A7991.13110)

The Forest Service should work with the local communities that are directly affected by any decisions concerning these wild lands overseen by tribes or state directly affected. Any organizations or individuals who claims to be “acting in the interests of the wilderness areas” are just that . . . acting! There is no way to put this much land back to 100 years ago”, nor should we. Our very lives depend on these watersheds, minerals and wood products. (Individual, Three Forks, MT - #A697.15100)

Local values should be of utmost consideration. Too many times have national decisions been made that have been very damaging to local economies and local lifestyles based solely on the desires of very vocal groups who seldom are directly impacted by those decisions. I know of no one who wants to

destroy or damage our local forest for the very fact that our lifestyles would suffer the most if we were to lose our access privilege either through loss of quality of forests or through regulations based on foreign decision making. Rural Utah does not have the population required to sway federal decision makers so making decisions based on political or nationally popular agendas is unfair and not necessarily best for the forests. (Individual, Richfield, UT - #A27881.13100)

**BECAUSE NATIONAL PLANNING DOES NOT ALLOW AN ADEQUATE TIMEFRAME TO CONSIDER IMPACTS ON INDIVIDUAL ROADLESS AREAS**

It is hard to fathom how a national policy could adequately evaluate all impacts to roadless areas within the eighteen months it took to develop and finalize the policy. Single National Forest planning, and even single project planning by the Forest Service, can take anywhere between one to five years to complete with a minimal average of least two years. These simple facts raise serious doubt as to the appropriate and adequately deliberated consideration of roadless policy impacts. An agency policy that affects all roadless areas through one national decision cannot address the unique forest conditions of each individual Forest or roadless area. Due to the time consuming nature of NEPA processes, and the lack of detailed roadless area information, there is much cause to support roadless area consideration through the normal National Forest Management Act (NFMA) authorized National Forest System planning process. (Professional Society, No Address - #A29920.10134)

**BECAUSE LOCAL PLANNERS ARE BEST ABLE TO DEAL WITH PROBLEMS IN A TIMELY MANNER**

I feel local situations require local decisions. Not only forest fires but insect infestations, watershed, and plant life trends need to be dealt with locally so those with the most information about a problem are able to design a program that best fills the needs in a timely manner. Too often invasive plants, insects, watershed problems and such have done so much damage by the time any local effort is allowed to be put into action. (Individual, Richfield, UT - #A27881.13110)

**IN SPITE OF THE THREAT OF LITIGATION FROM WILDERNESS ADVOCACY GROUPS**

Site specific and project level decisions should not come from the Washington D.C. office. The decisions should remain at the local level with input from the communities. We would like more advanced notice of public meetings. More public announcements of such meetings with lengthier comment periods in order to properly address issues of public concern. We urge you not to be influenced by the threat of litigation from Wilderness Advocacy Groups. We wholeheartedly support multiple use management for our public lands. (Organization, Bullhead City, AZ - #A12066.12100)

**226. Public Concern: The Forest Service should consider that localizing decisionmaking requires that current law be revised.**

Localizing decision authority is impossible, and will remain so, until NEPA, NFMA, and a pile of other Seventies-vintage laws are reformed. (Individual, Whitefish, MT - #A20672.20200)

**227. Public Concern: The Forest Service should allow local decisionmaking only if an easily accessible appeals process is in place.**

Local planning is too easily swayed by local issues and often fails to see the "big picture" that is more easily addressed on a national and international level. While local input is useful and should not be disallowed, the entire decision should not be left at a local level unless there are available and easily accessible appeal processes that can be accessed by any concerned person. (Individual, No Address - #A27088.10130)

**228. Public Concern: The Forest Service should develop regional guidance for implementing the Roadless Area Conservation Rule.**

The Douglas Indian Association, a Federally recognized tribe, respectfully requested that the USDA Forest Service revert back to regionalized planning in each of the national forests in the United States. The Roadless Policy placed on all the national forests last year minimized the benefits of the regionalized approach to land planning. The local management concerns are largely ignored with blanket policies such as the Roadless Policy. (Tribal Association, No Address - #A23324.12311)

**WHICH RECOGNIZES THE DIFFERENT CONDITIONS AND MANAGEMENT NEEDS OF FORESTS IN DIFFERENT AREAS OF THE COUNTRY**

Ecological needs and human values differ, for example, between eastern and western forests and the people who use them. The Wildlife Management Institute would support a provision in the modified Rule that authorizes the development of regional guidance to aid in implementation of the roadless Rule by allowing the consideration of factors that could vary geographically such as forest size, vegetation types, watershed configuration, and proximity of human populations. We believe these types of exceptions would address the principal concerns raised by stakeholders. If coupled with the establishment of categories of roadless areas for which exceptions would not apply . . . this limited expansion of the Rule's exceptions could furnish the basis for seeking consensus on a modified Rule. (Organization, Washington, DC - #A21762.45340)

Wisconsin forests and Wisconsin forest policy debates are different from western forests and western political issues. The roadless rule does not recognize this distinction, but should. (Professional Society, Eagle River, WI - #A19071.45600)

As you work toward a reasonable approach to this problem, remember that the one-size-fits-all theory that is so often used by government agencies is not appropriate in this case. The south is different from the Pacific Northwest, Lakes states and other sections of the country. It should be treated as such. (Business, No Address - #A17224.45341)

**229. Public Concern: The Forest Service should allow local districts to manage forests under a sustainable yield harvest plan.****TO ENABLE DISTRICTS TO BE ECONOMICALLY SELF-SUFFICIENT**

I say let each local district manage their forests on a sustainable yield harvest plan—trees in Colorado grow at a different rate than trees in Montana—trees around Seeley Lake grow at a different rate than trees by Philipsburg. Multiple-use is good and it fits well but again let each local district make their decisions. Each district needs to be self-supporting economically and decisions of their resources need to be made based on that. Example all the jobs in that district need to be supported by the resources of that district. (Individual, Seeley Lake, MT - #A5437.13110)

**230. Public Concern: The Forest Service should allow individual national forests to opt out of the Roadless Area Conservation Rule.**

I strongly support changes to the Roadless Area Conservation Rule. I particularly support allowing individual national forests to opt out of the rule and decide to go back to logging, building roads in, or otherwise developing these areas, including all those in Alaska's Tongass forest. (Individual, Marthasville, MO - #A6704.10130)

**OR TO MAKE LOCAL EXCEPTIONS TO THE RULE'S PROHIBITIONS**

I am in favor of allowing flexibility in the ruling to allow individual communities through local councils the ability to recommend areas that are practical for road building given circumstances unique to that community. For example, if the Ketchikan Assembly feels that areas within their jurisdiction are sensible for development, then there should be allowance in the law for that to happen, such as potential development on Gravina Island. There should be reasonable concession for recreation, mining and timber activities to continue. (Individual, Juneau, AK - #A23200.15111)

The FRWG supports opportunities for local input to the Rule in two basic ways. First, citizens living near the inventoried areas should have the opportunity, individually or through their organizations, to persuade the Service, in this review, that clearly defined and limited exceptions to the prohibitions, specifically designed to enhance the ecological values of roadless areas, should be made a part of the Rule, e.g. that geographic differences justify greater flexibility to address unique characteristics. Second, local input is important, and already provided for in the Rule, with respect to proposing and justifying

exemptions for specific activities in specific places. What should not be allowed, and cannot be justified if the Service is to keep its pledge, is the wholesale granting of discretion to adopt local proposals for road building or timber harvesting in the inventoried areas for whatever reason that may be put forward, such as, for vague and ill-defined forest health reasons. (Organization, Washington, DC - #A23283.15111)

**231. Public Concern: The Forest Service should not allow individual forests to opt out of the Roadless Area Conservation Rule.**

Local forests should implement and augment national policy protecting roadless areas (the Roadless Area Conservation Rule). They should NOT be allowed the option to ignore the Rule and develop their roadless areas. Instead, they should work to identify roadless areas that were omitted from inventories used to create the Roadless Area Conservation Rule, protect those newly identified roadless areas in the same manner as inventoried roadless areas (as Wilderness Study Areas are protected in the same manner as Wilderness), and submit them to the Forest Service national office for addition to the national inventory. (Organization, Escalante, UT - #A27872.13200)

**232. Public Concern: The Forest Service should recognize that “local expertise” may or may not be superior to professional Forest Service expertise.**

**DEPENDING ON THE MOTIVATION**

The notion that “local expertise” is superior to professional Forest Service expertise is both true and false, depending on the expert to whom you are listening. For the most part, in recent years, that notion has been promoted, not so much by local residents as by those who have invested in local land for mining, timber, recreation and/or grazing. I am well acquainted with a successful Colorado rancher who has been recognized by the USFS as a model steward of leased grazing land, and who is a supporter of roadless areas. Good business and conservation are not necessarily at odds, but greed and conservation are. “Local experts,” like my rancher friend, can indeed be more knowledgeable than well-educated government scientists familiar with a different part of the country, but they are often experts in only their own self-interest, not in the long-term best interests of the country. (Individual, Fort Collins, CO - #A12852.13110)

**233. Public Concern: The Forest Service should clarify how local expertise will provide more reliable information than was gathered for the Roadless Area Conservation Rule.**

The USDA apparently believes that the only true basis for decision is based on local input. The May 10, 2001 press release states that the USDA will examine “more reliable” information and accurate mapping, including drawing on local expertise and experience through the local forest planning process.” It is unclear how local expertise and experience will provide more reliable information than that gathered in the extensive review leading to the January 12th rule. The USDA should certainly be responsive to local input and information, but not to a greater extent than any other interested party. Local input is not the only source of reliable information. (Individual, Chico, CA - #A17483.15112)

***Local (Forest Level) Decisionmaking with National Guidance***

**234. Public Concern: The Forest Service should ensure that local forest planning adheres to the Roadless Area Conservation Rule.**

If you are asking what the job of the local Forest Service administrator is, it should be to manage the local forest as the public wishes, which the public has expressed previously concerning the roadless initiative. So, local forest planners should follow the national policy. (Individual, Macomb, IL - #A95.13130)

The current rule does not allow decisions to be made at the local level through the forest planning process under a set of national criteria.

The Secretary of Agriculture must establish national standards to guide roadless area conservation. The new rule should require Forest Service line officers to apply those standards through the forest planning process.

Further, the new rule should require Forest Service line officers to make decisions about roadless at the local level with adequate state and public involvement processes.

The new rule should eliminate the national application of the current rule.

I am in support of roadless area conservation of these roadless areas that meet the national standards based on the information available by area. (Individual, McMinnville, OR - #A818.13130)

Inventoried roadless area prohibitions must be codified in Forest Plan revisions and amendments but, for consistency, they must be decided Nationally for all roadless areas. This direction must apply to all National Forest roadless areas that exist. The local Forest manager should not be free to choose what may or may not take place on a roadless area. They must be involved in deciding how to best implement National direction.

This should be true even if that means rejecting an alternative project that is proponent driven, or a project that is strongly supported locally. (Individual, Grangeville, ID - #A830.13130)

These areas should clearly not be subject to local control, as this is clearly an issue that must have participation of the entire nation. Simply because land exists in a certain state or locality does not mean it is theirs to control in any way they wish, to possibly sacrifice long-term planning for short-term jobs. The Roadless Area Conservation Rule is required and protection of these areas must be secured into the future. Local areas can be involved in securing these areas and in making sure other suitable regions are likewise identified and protected. (Individual, Lexington, KY - #A1077.13130)

The role of local forest planning is to protect and manage inventoried roadless areas in accordance with RACR. These are National Forests, not local forests. (Individual, Livingston, MT - #A8306.13130)

Forest plans as they come up for renewal should be brought into alignment with the decision to protect remaining roadless areas. (Individual, Santa Fe, NM - #A11703.13130)

#### **BY NOT ALLOWING LOCAL FOREST PLANNING TO MAKE EXCEPTIONS TO THE ROADLESS AREA CONSERVATION RULE**

The Rule expressly allows for exceptions to the prohibitions, such as to protect public health and safety. Allowing forest plans to make additional exceptions for specific activities would completely undermine the Rule, setting the stage for a return to the incremental destruction of roadless areas that the Rule intended to stop. Roadless areas should receive additional protection through the forest planning process, especially from destructive off-road vehicles and mining. (Individual, Fresno, CA - #A1593.13100)

The regulations need to be more specific and to leave less decision making to the discretion of local responsible officials. They need more specific guidance in implementing the roadless area regulations. The vagueness of parts of the regulations make them subject to challenge in the courts. It is an important subject and the regulations are too brief, lacking in clarity and too open to interpretation by local "responsible officials." (Organization, Fullerton, CA - #A3705.13100)

#### **BY MAINTAINING A HIGH THRESHOLD FOR GRANTING EXCEPTIONS**

Procedures for granting exceptions based on local input should include public comment and place a high threshold to be crossed for granting exceptions. (Individual, Denton, TX - #A156.14410)

**235. Public Concern: The Forest Service should evaluate local decisions regarding inventoried roadless areas within the context of the Roadless Area Conservation Rule.**

**WITH REGULAR AND ON-GOING NATURAL RESOURCE INVENTORIES AND ASSESSMENTS**

The national public desires roadless areas to be continued in their unroaded condition. This question has been decided overwhelmingly. Within the RACR there is substantial flexibility and there are many local issues to be resolved within the framework of that flexibility. Many in the environmental community strongly argued that the RACR was too open ended in many regards, and these very issues now face local forests for planning and resolution. How the local forests make these decisions and implement plans may preclude additional issues from reaching the same level of national concern (e.g. off-road vehicle use and other activities . . . ).

As the Forest Service evaluates local decisions regarding inventoried roadless areas within the context of the Roadless Area Conservation Rule (and other national policy guidance), this evaluation needs to be done in the context of regular, on-going natural resource inventories and assessments, and at the time when decisions are to be proposed which may affect roadless areas covered by the Roadless Area Conservation Rule. Any evaluation prior to such decisionmaking process seems to be academic and a waste of time. (Individual, Corvallis, OR - #A15303.13130)

**236. Public Concern: The Forest Service should establish general guidelines for the consideration of roadless areas.**

Give local forest managers guidelines (like installing roads along contour lines and far away from streams) but allow them the responsibility to make decisions regarding management of local forests, inventoried or not. State Forestry agencies manage on a local level very well. (Individual, Princeton, WV - #A18086.13110)

Allow local forest planning to apply broad National standards in managing the roadless areas. Consultation with Wisconsin's citizens and resource professionals, not a directive from Washington D.C., should be at the forefront of such change. (State Agency, Madison, WI - #A28775.13110)

**WHILE ALLOWING EXCEPTIONS AS APPROVED BY THE SECRETARY OF AGRICULTURE**

A national rule should provide the overarching criteria for the preservation of inventoried unroaded areas and specify the exceptions. The designation of reconsidered or new candidate roadless areas should be screened to select those inventoried areas that are ecologically important. Examples of ecologically important areas would include those that are: critical to water quality; provide endangered species protection; include ecosystem values; and where there is public support to remain roadless and opportunities exist to minimize potential use conflicts. Any construction of new roads or improvement of existing ones in areas designated as roadless should be based on specific exception criteria set forth in a national rule. In cases where important national priorities need to be addressed, a mechanism should be developed to enable the Secretary to authorize an exception to a national rule. (Federal Agency, Washington, DC - #A28843.50000)

**WHILE ALLOWING FOREST SUPERVISORS TO NOMINATE AREAS SUITABLE FOR DESIGNATION**

The key question is. How many million of acres must be designated for such purposes, thereby essentially excluding all other uses and users? I believe this is suitably answered by allowing Supervisors of individual forests to nominate those portions most suitable for such designation following very specific scientific, economic and common sense criteria and guidelines that are applicable to all of our National Forests. Such criteria and guidelines must consider factors such as: The presence and abundance of sensitive species and amount and types of suitable available habitat present; the amount and type of commercial timber present and the economic and environmental costs and benefits associated with the harvesting and removal of the mature timber, accessibility of the areas to the public via existing roadways and trails and current and projected rates of use by the public (including ranchers holding grazing permits), the societal impact that closure of these areas to vehicular traffic would have on members of the public engaged in camping, bird watching, wildlife viewing, hunting, fishing, hiking,



trapping, collecting firewood, cutting Christmas trees, logging, livestock, grazing, and other economical and recreational pursuits. (Individual, Cedar City, UT - #A20426.12125)

#### **WHILE ALLOWING FOREST PLANS TO ALLOCATE LANDS**

The regulations should be general, short and simple, providing direction to guide consideration of roadless units in the forest plans. They should not make any blanket, nationwide set-asides of roadless lands. Allocation of these lands should be done in the forest plans. (Organization, No Address - #A8227.15100)

#### **WHILE ALLOWING FOREST PLANS TO ADDRESS SPECIFIC FOREST ACTIVITIES THAT ARE BOTH FEASIBLE AND SUSTAINABLE**

Agency goals for US Forest Service system ecosystem management should be broadly set at the top levels and should serve as an umbrella of guidelines for regional and local forest units to work within.

Within the overall guidelines for the agency, variations at the regional and/or individual forest levels should be allowed to address specific forest activities that are both feasible and sustainable. (Individual, No Address - #A29334.13130)

#### **WHILE ALLOWING FOREST PLANS TO DETERMINE THE RELATIVE MERITS OF THEIR ROADLESS AREAS AND NEED FOR ROADS**

The role of the National office of the Forest Service should be to provide direction or guidelines to help the forest or regions determine the relative merits of their roadless areas. This guidance shouldn't be a strict, by the numbers direction, but more general such as, amount of critical wildlife habitat, presence/how much spectacular scenery, relative regional abundance of undisturbed areas, how much local demand there is for roadless vs. roaded recreation, etc. A decision needs to also be made on whether an area is best managed with roads or without. Some areas in the West have tremendous accumulations of fuels that cannot be efficiently dealt with without building roads. Many of these values can be protected without declaring an area totally hands off. (Individual, Wrangell, AK - #A30478.13130)

### **237. Public Concern: The Forest Service should use local knowledge to enhance national planning.**

Local planning is essential, but should not outweigh federal planning efforts. Local planning is subject to too much manipulation by one or two powerful interests—for example, a large lumber company or mining outfit that employs a lot of people in a small town can corrupt the process. (Not that the USFS doesn't have the same problem, but at least there's some semblance of national oversight.) Federal planning should be in concert with local efforts. No one should need to reinvent the wheel to get something done—use local knowledge to enhance federal efforts. Use the people already on the ground, who have built up relationships with local people, and give them a clear cut set of criteria that they can defend, and send them out to do inventories. Make sure they understand that what they are doing is critically important, and that their work will not be overlooked or used against them down the road. Ensure there are systems in place to check for data anomalies, etc. (Individual, No Address - #A29275.13130)

## ***National Decisionmaking***

### **238. Public Concern: The Forest Service should make management decisions at the national level.**

#### **BECAUSE NATIONAL FORESTS ARE NATIONAL RESOURCES**

The local role should be highly limited in decisions about which areas should be subject to which conservation measures. National forests are national resources, so decisions about them should be made in the national interest. The interests of local players should receive a weight proportional to their membership in the national polity. Because local players often have more intimate knowledge about the national forests in their areas, they should be given a platform to voice their opinions and observations,

but not as deciding voice in matters that are of importance to all Americans whether or not they are in a position to live near a national forest. (Individual, New Haven, CT - #A616.13120)

I believe that national forests are national assets, and should be safeguarded as repositories of both tangible and intangible riches. It is the role of the government to examine the role of the whole national forest in the whole country, and to recognize and protect these designated national treasures for the long-term good of our country. It may be that local areas appreciate the importance of preserving local forests, or it may be that they do not. Because the latter situation will necessarily occur in some places, federal government must stand behind its name of “national” forest. (Individual, Fairfield, VA - #A15817.13130)

Roadless areas are part of our National Forest System and are a national resource that should be regulated by national policy. The administration does not contend that water quality should be governed by local opinion, or that nuclear safety and nuclear waste concerns should be governed by local opinion, or that drilling for oil, or that location of gas pipelines and energy transmission lines should be subject to veto by local citizens. In all of those areas the administration asserts that national environmental policies are essential. We believe that roadless areas are an important national resource and should likewise be governed by a national policy. (Organization, Seattle, WA - #A21702.13120)

The role of the local forest managers in the planning and administration of protection and management of our national forests should be limited to enforcement of a national policy only. National forests are a public trust that belong to all Americans and are not suited to be managed according to the whims and limited perspective of a local manager. A national policy dictating the protection of all remaining national forests should govern all local managers administration with no allowance for interpretation.

National forests are for the use of all people and are not to fall under the dominion a local community. (Individual, Vallejo, CA - #A27573.13120)

The attempt to gain more “local control and input” into the management of public lands under national management fails to consider that nationally managed public lands be managed in the national interests. We have already seen an explosion of influence buying and selling in Congress, and that same buying and selling of the public’s interests for private gain is also carried out at the local level, only at a reduced cost. Under this divide and conquer practice, local individuals can be pressured into, or influenced into accepting, incursions into the roadless area, ignoring existing protection and the reasons they have been put into place. I believe that since these public lands belong to all of the people, not just locals, management of the national forests should reflect this position. (Individual, Lewiston, CA - #A28731.13120)

Local input should be taken into account making management decisions; the degree to which local interests hold sway is the issue. Often local interests are at odds with the interests of the nation as a whole in preserving roadless areas in an undisturbed state. We would never stand for letting local citizens harvest timber in Yellowstone National Park, though some citizens of neighboring communities might want to, because we want to preserve the splendor of a national treasure. The same reasoning should apply to most roadless areas—they are also national treasures. (Individual, Bozeman, MT - #A20412.13120)

#### **BECAUSE DECISIONS MUST BE IN THE BEST INTEREST OF THE WHOLE COUNTRY**

Local forest planning must be given important consideration in evaluating protection and management of roadless areas of course. But remember that the forests belong to all of us including future generations. Any decisions must be truly national decisions that are in the best interest of the whole country. Remember that local folks, although they usually know the territory best, often have short-sighted goals. And local USFS personnel are often influenced too strongly by the local people with whom they live and work. (Individual, Boulder, CO - #A5250.13000)

Roadless areas have great national, regional, and local value as important watershed headwater areas, for rapidly growing outdoor recreation, and for wildlife, including, endangered species, habitat. The local planning process has failed to protect these values as local planners have routinely and narrow-mindedly given in to local timber, mining and ranching interests, often foolishly ignoring the economic value of recreational uses and clean, pure water. For example, the Southern Appalachian national forests have lost countless roadless areas to timbering and misguided road construction in the last few decades, even after study after study showed that the economic value of these lands for outdoor recreation far exceeded the timber values. I have no confidence in the failed local planning process. National forests belong to all Americans, not just local timber companies, mining companies, and ranching interests. Local interests should have input that is fully and fairly considered, and I believe that local interests should be met where reasonable. However, decision makers should consider the views of all Americans in managing the lands that those Americans own. (Individual, Conyers, GA - #A13536.13100)

Local forest planning and management has been the rule for the last hundred-plus years. The result has been the steady loss of wilderness and a network of forest service roads that exceeds the entire US interstate highway system in length and is impossible for the Forest Service to maintain. The local planning process is generally dominated by interests that stand to make personal financial gain through exploitation of a resource that belongs to ALL the citizens of the country. The remaining roadless areas are a national treasure and can only be protected by a consistent national policy. (Individual, Roseville, CA - #A10567.13120)

Local Forest Service representatives should be responsible for gathering information and submitting it to the offices in Washington, D.C. Their expertise is valuable towards understanding the specific attributes of individual federal forests. However, to allow these same local representatives to set policy is a mistake. This would have the effect of setting too many separate rules and guidelines across the country. While some people might find this appealing, it is flawed. These are federal lands. As such they should be managed by a broad set of rules across the board. Someone from Iowa who travels to Montana on vacation should not have to gaze upon clear-cut forests because local officials decided that they wanted to increase timber harvests. This visitor should have the comfort of knowing that when he travels to another state that the protection and management of forests is being macro-managed back in Washington D.C.

There exists an array of state, county and city land, which is managed and controlled at the local level as well as private lands. Our federal lands belong to everyone and must be managed as such. (Individual, Bozeman, MT - #A21355.13100)

#### **BECAUSE A UNIFORM POLICY IS NEEDED**

Regarding the role of local forest planning, it must be remembered that one of the primary reasons why the roadless rule is needed so badly has been the failure of the local forest planning process. While it is important that the local foresters, who are supposed to be intimately familiar with their forest, to play a key role in evaluating options for the protection and management of roadless areas, the process for doing so needs to be standardized at a national level. Policies should be uniform, not localized. These lands are Federal lands, not State or local lands, and as a U.S. citizen I want to be assured that the maximum level of protection is afforded to roadless lands across the country. (Individual, Renton, WA - #A22439.13120)

There is a need to provide a strategic view of roadless areas nationwide to avoid a patchwork approach to the management of our National Forest resources and to ensure adequate protections for these lands. The Roadless Area Conservation Rule addresses this strategic approach. As provided by the rule, local forest planning should provide additional protection to prevent damage to roadless areas and ensure that the roadless inventories are complete.

The record shows that local forest planning is not adequately protecting roadless area and going forward, current forest plans make about 60 percent (34.4 million acres) available for road construction, logging and commodity development. The Roadless Area Conservation Rule prevents this loss. (Business, Sumner, WA - #A21731.13110)

**BECAUSE THE FRAGMENTATION CREATED BY ROADS TRANSCENDS LOCAL AND REGIONAL MANAGEMENT**

The problems associated with fragmentation by roads are too complex to rely on decisions made at the Forest or Regional levels. Many species that depend on National Forest such as grizzly bears, wolves, and Canada lynx must be managed over very large scales. For this reason, fragmentation of our National Forests by roads is a problem that transcends management at the local or even regional level, particularly near the border of two Forest Service Regions. It is essential that Roadless Areas be protected by a uniform, national rule. (Individual, Evergreen, CO - #A20492.13120)

**BECAUSE FEDERAL DOLLARS SUPPORT THE FOREST SERVICE AND THE LANDS IT ADMINISTERS**

As long as federal dollars support the Forest Service and the lands [it] administers, these lands should be subject to protection and regulation on the federal level. (Individual, Reno, NV - #A20755.13120)

**BECAUSE LOCAL INTERESTS MAY BE TIED TO THE PROFIT MOTIVE OF LOCAL INTERESTS AND NOT REPRESENT THE COLLECTIVE WILL OF THE STATE OR THE NATION**

Local planning should be considered but not be given too much weight if there is a conflict-of-interest. For example, local interest may be tied to the profit motive of local business interests and not represent the collective will of the state or the nation. (Individual, Gaithersburg, MD - #A5191.13000)

The Forest Service has long been a servant of local interests. District Rangers, in an effort to endear the communities in which they live, often place local logging over the good of the forest as a whole. These are NATIONAL forests, not local forests! The Forest Service has lost sight of that fact. The National Forests were created in the early 1900s in response to the abuse of logging of the private sector. We now need to set aside Roadless Areas in response to the abuses of logging within the National Forests. (Individual, Olympia, WA - #A614.13120)

Local USFS supervisors and planners should never be allowed to determine roadless area objectives, goals and prohibited activities on a given forest. Local planners should not decide what to do with roadless areas. They should decide how to best implement National roadless policy and direction. If left up to local managers to decide how the roadless areas should be managed, a myriad of personal commodity extraction favoring values (for those who have them) will enter the picture. If this is allowed to happen, some roadless areas will be roaded/clearcut and others will be preserved. (Individual, Grangeville, ID - #A830.13120)

I firmly believe that our national forests are just that. They are national lands that should be governed by national policy. States already have separate resources that fall under the direct control of state agencies. In my state of Washington, the Department of Natural Resources is currently looking into logging of old-growth forests in these areas to provide state funds in direct threat to endangered species. I firmly believe that increasing local influence on roadless areas conservation will lead to a slow but certain destruction of these areas. Local influence almost always means that there are specific extraction advocates that stand to make substantial financial gains from reduced protection. These interests are thus willing to place significant money behind their lobbying efforts. It is more difficult for the many varied interests of the citizens to organize against such focused moneyed interests, and it is an undue and unrealistic burden to expect the citizens to marshal forces against each and every individual threat. Let us citizens feel safe that these roadless areas will remain preserved as is, without having to continually watch over our shoulders for the next assault by "well meaning, local" interests driven by profit. (Individual, Seattle, WA - #A21682.13120)

**BECAUSE THE FOREST PLANNING PROCESS HAS FAILED TO ADEQUATELY PROTECT ROADLESS AREAS**

The ANPR never mentions that the Rule was developed with the most extensive public participation ever in a federal rulemaking. Instead, it just cites allegations in lawsuits that "there was inadequate opportunity for public review and comment on the roadless rule." Thus, the administration seems to ignore the 1.6 million public comments in support of roadless area protection.

The administration seeks to undermine the legitimacy of the environmental impact statement (EIS) for the rule. The ANPR states that “it is difficult, and perhaps infeasible to collect in a short timeframe, on a national scale, the local data needed to produce a sufficient EIS that analyzes all relevant information or that proposes an adequate range of alternatives.”

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or “other resource potentials.” It observes that the resource values of roadless areas “vary in importance”, specifically pointing out that roadless areas contain 9 million acres of “productive timberland.”

The administration extols the local forest planning as a highly collaborative process involving local, regional, and national interest, using the best available forest-level information and maps. It does not point out the past failure of the forest planning process to protect roadless areas, allowing roads to be built in most of the remaining roadless land. Nor does the administration mention that it is in the midst of amending the forest planning regulations to greatly weaken environmental safeguards and public participation opportunities in the planning process. (Organization, Pinckville, TN - #A5167.12200)

The National Forest planning process has clearly failed to provide adequate protection of roadless areas, and most certainly will continue to be the case in the future, especially given that the Administration is also weakening forest planning regulations. In existing national forest plans, about 60 percent of remaining roadless areas are open to road construction and logging. Continued incremental loss of roadless areas will continue without the Roadless Areas Conservation Rule. (Individual, Hewlett, NY - #A4748.10111)

The Forest Service’s legacy, unfortunately, is not a pretty one. Decades of mismanagement have led to the fragmentation of forest ecosystems, liquidation of old growth forests, and the demise of many fish and wildlife species. In the Pacific Northwest, for example, less than 10 percent of old growth/late successional forests remain and species such as the northern spotted owl, salmon, and marbled murrelet teeter on the brink of extinction. The Sierra Nevada, christened the Range of Light, by John Muir, is unraveling after over a century of logging, mining, and ranching. Species in the Sierra, including the California spotted owl, wolverine, Pacific fisher, American pine marten, and northern goshawk are quickly disappearing. In the southwest, cows have driven out native species, degraded riparian areas, and eroded soils. Off road vehicles run roughshod over public lands across the country. Forests in the mid-west, northeast, and southeast have been so heavily fragmented that few contiguous, large roadless areas exist. And oil, gas, and mining projects, as well as ski resorts, in the northern Rockies have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process. (Organization, Nevada City, CA - #A4941.10111)

The Administration appears bent on ignoring the fact that 1.6 million comments were submitted the FIRST time around. A hearty ninety-five percent of these comments SUPPORTED the Roadless Plan and some advocated even stronger protections. Moreover, to propose now that all decisions are made on a local basis is a giant step backwards. History demonstrates that local decision-making hasn’t worked to protect roadless areas for a long time. Therefore, a national policy designed to protect our nation’s roadless lands is imperative. (Individual, Durham, NC - #A934.10111)

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midwest, northeast, and southeast have been so heavily fragmented that few contiguous, large roadless areas exist. And oil, gas, and mining projects, as well as ski resorts, in the northern Rockies have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process. (Individual, Boise, ID - #A20396.10111)

I do not want to see Congress and our federal officials make any changes to the current Forest Service's Roadless Area Conservation Rule.

We spent a lot of time (and tax dollars) carefully gathering public opinion to promulgate this rule in the first place. Our country clearly wanted the remaining 30% of our wild national forests protected from human intervention into forest ecosystems through mining, drilling and logging operations. The present Conservation Rule nicely addresses access and local input. The proposal to address each forest area individually will NOT maintain these critical protections. (Individual, Northville, MI - #A179.10111)

The Roadless Rule is needed because local forest planning has failed to protect significant roadless areas in the past. For example, the HD Mountains inventoried roadless area includes over 30,000 acres of lower elevation old-growth ponderosa-pine forests and pinyon-juniper woodlands. Ignacio Creek in the heart of the roadless area is one of the most pristine lower-elevation riparian systems in the Rockies. This ungrazed, unlogged, unroaded watershed is a proposed Research Natural area. Despite the superlative values of the HD Mountains, the existing forest plan adopted in the early 1980s left the area open to oil and gas exploration and development. Consequently, most of the area was leased in the 1980s and 1990s without consideration of the impacts that cutting roads through this pristine landscape will have on a rare, unroaded, lower-elevation ecosystem. Forest Planning utterly failed to protect the HD Mountains which is why the Roadless Rule is needed now. (Individual, Durango, CO - #A11655.10111)

#### **BECAUSE LOCAL PLANNING HAS RESULTED IN AN \$8.5 BILLION ROAD MAINTENANCE BACKLOG**

Forest-by-forest decisions have resulted in nearly 400,000 miles of roads and an \$8.5 billion road maintenance backlog in our National Forests, all borne by the taxpayer. Indeed short-sighted local decisions on forest management are what created the need for the RACR. (Individual, Minneapolis, MN - #A10523.17240)

#### **BECAUSE REGIONAL OR NATIONAL PERSONNEL HAVE BETTER ACCESS TO QUALIFIED SCIENTIFIC OPINION**

Local decisions will be influenced by politics and personal agendas and do not incorporate the large picture. Regional or national FS personnel are more immune to local politics and have better access to qualified scientific opinion. (Individual, Hamilton, MT - #A26764.13000)

#### **BECAUSE LOCAL PLANNERS ARE OFTEN INCOMPETENT**

Local forest planning should be considered so long as it is done by competent planners, which is often not the case. Local input to knowledgeable planners is most certainly a positive. (Individual, Corvallis, OR - #A1132.13100)

#### **BECAUSE THE POLITICAL WILL TO PROTECT ROADLESS AREAS CAN NOT BE FOUND AT THE LOCAL LEVEL**

Informed decisionmaking. The roadless areas have already been inventoried, their descriptions are in the forest plans, and their values are listed. Local planning is finished. We need only the political will to protect them. You won't find political will at the local level; it's hard enough to find it at the national level. Local meetings were held nationwide. I attended them, and I heard overwhelming support for complete protection. (Individual, Eugene, OR - #A13952.12100)

#### **BECAUSE ALLOWING LOCAL DECISIONMAKING WOULD WEAKEN THE ROADLESS AREA CONSERVATION RULE**

Forest-by-forest decisions do not need to be made. Not meaning to sound overly dramatic, but when we begin discussing and considering changing the protection for the national forest so decisions are made on a case-by-case basis, it will become too easy to pick apart each forest one at a time with time, eventually

leaving us and future generations with nothing but a raped, wasteland. Please don't allow these protections that have already been put into place to be weakened. Know that not only do I strongly oppose weakening of our national forest protection through forest-by-forest decisions, but so do many of the other voters in America. We DON'T want to see logging and development in roadless areas. (Individual, Saint Petersburg, FL - #A202.13120)

As to "local control," I have serious reservations about ceding control of federal assets to any entity which is not directly accountable for their misuse. The Forest Service, through the President and unlike state or local entities, is accountable to the federal taxpayers and I expect them to take that responsibility seriously. The administration's current attempts to weaken the Roadless Rule do not appear to take this responsibility into account. (Individual, Broomfield, CO - #A211.13120)

#### **WITH LOCAL FOREST PLANNING SERVING IN AN ADVISORY AND TECHNICAL ASSISTANCE CAPACITY**

Local forest planning should serve in an advisory and technical assistance capacity. Ultimate decision-making authority should be maintained by the federal government. National Forests belong to all citizens of the United States of America; not just the local people in the vicinity of a subject forest area. (Individual, Olympia, WA - #A26693.13120)

### **239. Public Concern: The Forest Service should make management decisions only at the national level.**

#### **WITH NO ROOM FOR LOCAL INTERPRETATION**

Management of our national forests should be limited to enforcement of a national policy only. National forests are a public trust that belong to all Americans and are not suited to be managed according to the whims and limited perspective of a local manager. A national policy dictating the protection of all remaining national forests should govern all local manager administration with no allowance for interpretation.

National forests are for the use of all people and are to fall under the dominion a local community. (Individual, Petaluma, CA - #A17057.13210)

### **240. Public Concern: The Forest Service should not change the management guidelines of the Roadless Area Conservation Rule to conform to local government plans.**

The Forest Service has already provided states and local governments with ample opportunities to comment on the proposed roadless area rule, and incorporated many changes suggested during the public comment period into the final roadless area conservation rule. Under no circumstances should the management guidelines of the national roadless area conservation rule be "bent" to conform to local government plans. This is a national protection program to conserve a resource of national interest, undisturbed and unroaded natural areas. A national perspective must be maintained at all times. (Individual, Palo Alto, CA - #A15827.15130)

## **The Forest Planning Process**

### **Summary**

**General Comments** – General comments on the forest planning process are varied. According to one individual, the Secretary of Agriculture's five principles effectively states that the local forest planning process must be used, an implication that the Secretary gives no weight to any method of decisionmaking other than the local forest planning process. Others assert that roadless issues have already been adequately addressed in the forest planning process.

Some respondents say the Forest Service should clarify that, even with the Roadless Area Conservation Rule in place, many management decisions would continue to be made through the

forest planning process. Further, others assert, the local forest planning process is complementary and consistent with the Rule, and can therefore proceed in tandem with the Rule's full implementation.

Finally, some organizations claim that the National Forest Management Act does not actually mandate local forest planning (for more on the National Forest Management Act, see Chapter 2: National Forest Management Act).

**Development/Implementation of Forest Plans** – Some respondents comment on the development and implementation of forest plans. According to one individual, the Forest Service should ensure that any national forest without a forest plan in place immediately begin the public process of creating one. On a similar note, others recommend that forest plans be amended and/or revised in a timely manner and that the Agency make efforts to remove institutional impediments to implementing existing forest plans, especially in light of the considerable time and money that have already been invested in forest plan development.

**Public Participation in the Forest Planning Process** – A number of individuals comment on public participation in the forest planning process. Some suggest the Forest Service should ensure all stakeholders equal access to the forest planning process by proactively seeking them out and inviting their participation. Others state that forest plans should more adequately reflect the concerns expressed by the public during their development. One respondent says of his own experience that many people worked hard, both Agency and the public to develop a meaningful plan but when the final was released, it did not resemble their input. Finally, one individual suggests opening all local forest planning processes to the American public at large by posting local decisions on the internet for all to review and comment on.

**Appropriate Role of the Forest Planning Process** – Respondents offer a wide array of suggestions regarding the appropriate role of the forest planning process. Suggestions range from identifying local concerns, attitudes, issues, and problems that might otherwise remain unknown at the national level to implementing national directives and maintaining and protecting maximum amounts of remaining roadless areas. Some suggest its role is to restore natural processes to roadless areas, and to protect public lands from undue use. Others suggest that its role is to identify roadless areas that are not in the current inventory and roadless areas that need to be restored; to address management of uninventoried and unroaded areas; to determine roadless area boundaries and develop site-specific resource prescriptions compliant with the Roadless Area Conservation Rule; and to identify local resources that may merit additional protection. According to one organization, however, the appropriate role of the forest planning process cannot be determined until changes to the Planning Regulations are finalized.

## *The Forest Planning Process General*

### **241. Public Concern: The Forest Service should consider that the Secretary of Agriculture's five principles imply that only the forest planning process must be used for managing Roadless Areas.**

*On May 4, the Secretary of Agriculture presented five principles on which the protection and management of roadless values should be based: 1. Informed decision making, using reliable information and accurate mapping and drawing on local expertise and experience through the local forest planning process.*



Very interesting. The Secretary of Agriculture is effectively stating that the local forest planning process must be used. . . . this statement implies that the Secretary gives no weight whatsoever to any method of decisionmaking other than the local forest planning process. This implication is grave indeed, as a closed mind is a most dangerous weapon. It also further erodes my personal confidence in the capability of the Secretary and the directives that issue from that office. And, in all cases where a position reports to another position higher in a hierarchy, such a case also erodes the confidence on the capabilities of selection, management, oversight, and acceptance of responsibility of the higher position. In this case, that position is the President of the United States. (Individual, Nederland, CO - #A19016.11110)

**242. Public Concern: The Forest Service should consider that roadless issues have been addressed in the forest planning process.**

There appeared to be a misconception that the roadless issues had not been addressed in earlier planning processes. The draft EIS noted that the roadless issues:

“ . . . have not been effectively resolved at the local level in many places . . . . ”

However, review of the land use plans reveals that this is a very subjective statement that ignores the long history of this issue being addressed and resolved in local LRMPs, the Oregon Wilderness Act of 1984 and other Wilderness Acts, the Hells Canyon National Recreation Area Act, Oregon Omnibus Wild and Scenic Rivers Act. In every case the applicable roadless areas were reviewed and decisions made to allocate them to other land uses or otherwise release them from roadless or wilderness reviews. While Congress intended these acts to be compromises, the interest groups have clearly seen them as merely a shift in the goal posts and not the good faith compromises intended by Congress to resolve the issues. To maintain stability in the local communities it is important that the Forest Service adhere to these compromises and the land and resource management plan outputs. (County Attorney, Grant County, OR - #A17667.20200)

**243. Public Concern: The Forest Service should recognize that implementation of one of the Roadless Area Conservation Rule action alternatives amounts to an amendment to or modification of forest plans.**

**THE INYO FOREST PLAN**

The intent behind the Roadless Initiative is to in effect update or modify RARE II. The problem with this approach is that the entire Forest Plan process which resulted in the current Plan for the INF [Inyo National Forest] is now being leap-frogged or bypassed without USDA complying with NEPA or other applicable federal law. Implementation of one or more of the Action Alternatives in the Roadless Initiative will not only supersede or amend RARE II, but more importantly will amend or modify the [Inyo National Forest] Plan. (Business, Mammoth Lakes, CA - #A30296.20200)

**244. Public Concern: The Forest Service should ensure that the forest planning process is interdisciplinary and based on site-specific ecosystem considerations.**

The role of local forest planning is to prepare plans from an interdisciplinary perspective. Considerations are to be made on the requirement of all flora and fauna and how they all interact in the ecosystem. Mankind's desires for the use of these ecosystems are to be weighted against the impact of such uses. Such ecosystem based plans can only be developed on a site-by-site basis. (Individual, Evergreen, CO - #A19178.13200)

**245. Public Concern: The Forest Service should clarify that, with the Roadless Area Conservation Rule, many management decisions would continue to be made through the forest planning process.**

In addition to the numerous ways in which the Rule preserves local discretion to regulate those aspects of road-building and logging that do not threaten the greatest, most indelible harm, it leaves many other

roadless area management decisions to regulation through the National Forest Management Act (NFMA) planning process. For example:

The Rule does not bar off-highway vehicles (ORVs), instead leaving them subject to local regulation. As on other non-wilderness lands, ORV routes in roadless areas that are designated and managed as trails by the local national forest are not considered roads and therefore can be maintained by the agency.

The Rule does not prohibit or regulate mining for locatable minerals. Miners who would have a right to build a road through a roaded area will continue to have one through roadless areas.

Areas too small to be included by national forests in their roadless area inventories or never inventoried for other reasons are not covered by the final Rule. Their management is determined through local processes, under the Rule.

Regulation of grazing is left unaffected by the final Rule, despite the demonstrated link between grazing domestic stock in forestlands and increased in-growth of flammable understories. (Organization, Olympia, WA - #A20145.13130)

**246. Public Concern: The Forest Service should ensure that decisions reached through the local planning process cannot easily be changed by Congress.**

The results of properly conducted forest planning must be respected. Otherwise, planning is just a sham. The rules should make it more difficult for politicians to change decisions that were reached through the planning process. (Individual, No Address - #A17292.13000)

**247. Public Concern: The Forest Service should recognize that the local forest planning process is complementary and consistent with the Roadless Area Conservation Rule.**

**AND CAN PROCEED IN TANDEM WITH THE FULL IMPLEMENTATION OF THE RULE**

The Roadless Area Conservation Rule is not a substitute for local forest planning, nor is such local planning a substitute for the Rule. Local forest-by-forest planning is thoroughly complementary and consistent with full implementation of the Rule, and can proceed in tandem with it as it does with other national rules and legislation designed to protect our public lands. Those who have criticized the Rule as a top-down federal imposition on local forest planning ignore that fact, as well as the Rule's remarkable public support throughout the country and the critical role of enlightened federal policymaking in conserving our public lands. (Individual, Wonalancet, NH - #A8275.13110)

**248. Public Concern: The Forest Service should recognize that the National Forest Management Act does not mandate local forest planning.**

The NFMA does not provide any specific direction for "local forest planning".

Section 1612 of the Act deals with "Public Participation"; subsection (1) addresses "Adequate notice and opportunity to comment"; and subsection (b) deals with "Advisory Boards." Subsection (b) states:

In providing for public participation in the planning for and management of the National Forest System, the Secretary, pursuant to the Federal Advisory Committee Act (86 Stat. 770) and other applicable law, shall establish and consult such advisory boards as he deems necessary to secure full information and advice on the execution of his responsibilities. The membership of such boards shall be representative of a cross section of groups interested in the planning for and management of the National Forest System and the various types of use and enjoyment of the lands thereof.

Note that there is no reference to "local planning, the advisory boards are not mandatory, and if implemented should show a cross section of groups. WildLaw interprets this to include environmental organizations. WildLaw also believes that the absence of "local" planning in the Act was intentional. (Organization, Montgomery, AL - #A27512.15121)

The NFMA does not provide any specific direction for "local forest planning". Section 1612 of the Act deals with "Public Participation"; subsection (a) addressed "Adequate notice and opportunity to comment"; and subsection (b) deals with Advisory Boards." Subsection (b) states:

In providing for public participation in the planning for and management of the National Forest System, the Secretary, pursuant to the Federal Advisory Committee Act (86 Stat.770) and other applicable law, shall establish and consult such advisory as he deems necessary to secure full information and advice on the execution of his responsibilities. The membership of such boards shall be representative of a cross section of groups interested in the planning for and management of the National Forest System and the various types of use and enjoyment of the lands thereof.

Note that there is no reference to “local” planning, the advisory boards are not mandatory, and if implemented should show a cross section of groups. The UEC interprets this to include environmental organizations. The UEC also believes that the absence of “local” planning in the Act was intentional. Congress set aside the public lands for the enjoyment of all Americans, not just those who live in the state where the land exists. (Organization, Salt Lake City, UT - #A17170.13110)

**249. Public Concern: The Forest Service should consider that, by its own actions, it has disabled itself from managing roadless areas through the normal planning process.**

The role of the Forest Service in evaluating roadless areas has been a catch 22. The Forest Service was not legally compelled to perform its RARE studies, but having done so in a way that was then deemed unsatisfactory to the federal courts, the Forest Service inadvertently disabled itself thereafter from managing the roadless study lands through the normal planning process. (Individual, Spokane, WA - #A17819.45400)

***The Forest Planning Process – Development/Implementation of Forest Plans***

**250. Public Concern: The Forest Service should ensure that any national forest without a forest plan in place immediately begin the public process of creating one.**

**BECAUSE FORESTS WITH PLANS IN PLACE DO NOT NEED ADDITIONAL ROADLESS AREA PROTECTION**

The decision of how to manage individual inventoried roadless areas should be broadly based on the five principles outlined by Secretary Venneman on May 4, 2001. For each national forest it should be a function of the forest plan. Any national forest with forest management plan in place should have no immediate need of any additional roadless area protections added at least until a forest plan revision is done. Any forest without a plan in place should immediately begin the public process of creating one. (Individual, Ketchikan, AK - #A23219.13200)

**251. Public Concern: The Forest Service should ensure that forest plans are amended and/or revised in a timely manner.**

Forest plans must be amended and/or revised in a timely manner in order to address the protection of roadless areas. However, the Forest Service cannot, on the one hand, acknowledge the role of forest plans to make future decisions about roadless area management while on the other hand ignoring forest plan decisions about roadless area management. This is especially true for the national forests that have completed a revision of their forest plans. Inventoried roadless areas have been subject to in-depth analysis and evaluation since the first Roadless Area Review (RARE I) in 1972. During development of the forest plans, the presence or absence of a road did not exclusively drive the decisions on land allocations, but more appropriately, decisions were based on examination of the full range of values on these lands. This should be the same for future amendments and revisions of the plans. (Business or Association, Washington, DC - #A26728.13200)

**252. Public Concern: The Forest Service should consider the time and money that has already been invested in forest plan development.**

We are especially concerned that the Roadless Rule changed portions of the just-revised Black Hills National Forest Plan dealing with management of roadless areas. Many public and private organizations and residents of the Black Hills Region invested a lot of time and energy over the 7-year process to revise the Plan. (Business, Rapid City, SD - #A30145.20201)

NFMA makes the land and resource management plan (forest plan) the focal point for management of each national forest. The proposed rules runs counter to the NFMA and the 36 C.F.R. Part 219 provisions on forest planning. The national rulemaking would override most of the 124 forest plans the agency has prepared at great public expense. Our tax dollars are being wasted as a result of lack of consideration for local forest planning. (Professional Society, Anchorage, AK - #A21707.20201)

**253. Public Concern: The Forest Service should make efforts to remove institutional impediments to implementing existing forest plans.**

The Forest Service's focus on planning while failing to implement its existing plans in a timely manner has had a significantly negative impact on our local communities. It is our position that the time and monies of the Forest Service would be better spent in removing the institutional impediments to implementing the existing forest plans. (Elected Official, Douglas County, OR - #A11811.13000)

**254. Public Concern: The Forest Service should use the National Forest Management Act processes in developing forest plans rather than the Forest Service Manual 7710 road management policy.**

The policy (FSM 7710) governing road management must be re-examined also. It does not allow for adequate input from those affected and has probably been the cause for much of the distrust and anger many of the citizens have displayed and continue to display towards the Forest Service. Roads have been closed to protect the environment (erosion into streams) while cattle continue to damage the stream bank and put more silt into the stream than the road ever did. Roads have been closed off a couple hundred yards from ideal campsites used by elderly and disabled for causing safety concerns with backing and congestion at the road end. All this could be avoided if properly administered NFMA processes and not the FSM 7710 road management policy were used to develop plans. Individual area advisory groups are critical to the process. (Individual, Rock Springs, WY - #A22428.20500)

*The Forest Planning Process – Public Participation*

**255. Public Concern: The Forest Service should ensure all stakeholders equal access to the forest planning process.**

**BY PROACTIVELY SEEKING OUT STAKEHOLDERS AND INVITING THEIR PARTICIPATION**

The Forest Service should ensure that all stakeholders have equal access to the deliberative process and have an equal opportunity to provide input. No single group or individual should be granted special access through private meetings or similar arrangements. The Forest Service should be proactive in seeking out stakeholders and inviting their participation. At a minimum, one individual in each regional office should be designated with this responsibility as a full-time job. A better, but probably not cost-effective approach would be to have one individual in each national forest. The key perception to be created is that all stakeholders have an equal opportunity to participate in the process and that no stakeholders are granted special privileges. (Individual, Marietta, CA - #A4827.15000)

**256. Public Concern: The Forest Service should encourage timely participation in the forest planning process.**

States, tribes, local communities, other organizations and individuals can be led to the process but cannot be forced to participate in it. However, if they do not participate in a timely manner there should be

some way of preventing their coming up out of the woodwork at a later date to function as spoilers. (Individual, Olympia, WA - #A278.15111)

**257. Public Concern: The Forest Service should ensure that forest plans reflect public concerns.**

Some years ago my wife and I drove 200 miles (one-way) to participate in the public meetings for a Forestry Plan which lasted about six months. The two dozen well educated Citizens and USF professionals worked hard to build a meaningful PLAN. But in the END the FINAL PLAN I was mailed had no resemblance to the meetings I attended. (Individual, Center Sandwich, NH - #A3669.15110)

Working Together. The best way for the Forest Service to work with the various government entities and publics is through the NEPA and NFMA public involvement processes. These provide for public input in an open decision-making manner. That is, people are encouraged to enter into collaborative discussions early and often in the decision-making process, and the agencies not only listen carefully to those publics but incorporate their wishes and desires in a range of alternatives that considers all view points.

The open decision-making process often breaks down at this latter point. For instance, in the preferred alternative for the Wasatch-Cache revised forest plan, the Forest proposes to adopt the Clinton roadless rule and treat all roadless areas exactly the same. This is in direct opposition to the input the Forest received, which suggested some areas remain roadless and some be developed. The Wasatch-Cache personnel listened to the public, but then it imposed its own values on the interested parties.

The hard part of an open decision-making process is that it requires the agency to give up some control over the forest and share that control with the public. Some Forests have not mastered this technique yet. Our point here is that the Forest Service should use the NEPA/NFMA regulations to collect public input and then incorporate that input into management direction in a fair and impartial manner without overriding that input with their own values. (Elected Official, Clark County, Dubois, ID - #A23504.20200)

**258. Public Concern: The Forest Service should recognize local contributions to forest plans.**

We are very concerned about the lack of attention being afforded the local communities' contributions in the land and resource management planning processes. In a rather arrogant and patronizing manner, the DEIS arbitrarily and capriciously dismissed the LRMPs as being adversely influenced by the local communities. The DEIS implied that the land allocations and management decisions relative to the roadless areas were made by the local Forests without input from the regional offices or Washington office. Contrary to the DEIS implication, review of the planning process reveals that prior to adoption, all of the LRMPs were reviewed by the Regional and Washington offices. Likewise after adoption, any appeal or challenge to the LRMPs were resolved at the Regional office and generally only after concurrence by the Washington office. The DEIS statement is simply an insult to those parties who participated in the LRMP process and serves to discourage public participation in any future planning efforts. Absent a more in-depth justification for this proposed rule, it is our position that this action is not supported by history and undermines the entire forest planning process. (Elected Official, Douglas County, OR - #A11811.15111)

**259. Public Concern: The Forest Service should open all local forest planning processes to the American public at large.**

**BY POSTING LOCAL DECISIONS ON THE INTERNET FOR ALL TO REVIEW AND COMMENT ON**

I recommend that all local forest planning processes be opened up to the American public at large. Decisions made at these local forest planning sessions should be made public on the Internet for all Americans to review and comment on. These are our lands, after all, and we have the right to know what is being done to them, and how well the local administrators are implementing the wishes of the American people. (Individual, Ballwin, MO - #A17037.13210)

## *The Forest Planning Process – Its Appropriate Role*

### **260. Public Concern: The Forest Service should consider the appropriate role of the forest planning process.**

#### **TO IDENTIFY LOCAL CONCERNS, ATTITUDES, ISSUES, AND PROBLEMS THAT MIGHT OTHERWISE REMAIN UNKNOWN AT THE NATIONAL LEVEL**

I agree with the USFS [United States Forest Service] conclusion that the best way to reduce conflicts involved with the management of roadless areas is through a national level rule. The fact that over half of the roadless area acreage has prescriptions allowing road construction and reconstruction indicates input at the local level does always promote national policy.

I believe the appropriate role of local forest planning in evaluating protection and management of inventoried roadless areas (IRAs) is to provide constructive input. This would include identifying local concerns, attitudes, issues, and problems that might otherwise remain unknown at the national level. This local participation would at least “flavor” national directives, and regional and forest level resources will still be responsible for day-to-day management. (Individual, Vista, CA - #A4838.13100)

#### **TO ASSESS THE IMPACTS OF A PROPOSED ACTION**

The appropriate role of local forest planning in evaluating, protecting and managing of inventoried roadless areas is to assess the impacts of the proposed action and to integrate those impacts into the process so the public is aware of the consequences. (Business or Association, Sandy, UT - #A15656.15111)

#### **TO RESOLVE ROADLESS ISSUES**

IFOA notices that questions #1, #2, and #9 deal with public input as required by the National Environmental Policy Act of 1969 (NEPA). We strongly feel that Congress in passing the 1969 act did not intend for public input to become a tool to stop management activities on federal lands. It is very unfortunate that some groups have used this tool for that purpose. Diverse groups will work together in a collaborative manner only when there is the common desire to resolve an issue. It is unfortunate that some groups have no desire or incentive to see the roadless issue resolved. Solving the roadless issue is best accomplished through the forest planning process as directed in the National Forest Management Act of 1976 (NFMA) and settlement of the RARE II lawsuits. The Forest Service should proceed in a responsible manner. (Business or Association, Coeur d'Alene, ID - #A15260.15000)

#### **TO MAINTAIN MAXIMUM AMOUNTS OF REMAINING ROADLESS AREAS**

The appropriate role of local forest planning is to maintain a large-scale inter-connected national view, and thus maintain the absolute maximum amounts of remaining roadless areas, for the greatest local and national public value. (Individual, No Address - #A4499.13100)

#### **TO PROTECT ROADLESS AREAS**

Your agency is supposed to be managing the forest on behalf of a national constituency, the vast majority of which is overwhelmingly supportive of conservation-based management practices as exemplified by RACR. Therefore here are some short answers to “What is the appropriate role of local forest planning:”

- a. Insure the roadless areas remain protected.
- b. Prevent damage from off-road vehicles. (Individual, Somers, MT - #A11866.13210)

The appropriate role of the local forest planning (as noted, required by NFMA) is to manage the roadless areas as roadless areas. This means exactly what it says, no roads. Access is restricted to non-motorized vehicles that can negotiate trails or trail-less areas. The local forest planning should regard this charge as seriously as it regards any other charge it has, including timber or mineral production. (Individual, Cleveland, SC - #A21250.13200)

The proper role of local forest officials should be to protect the roadless areas from destruction thru the unnecessary creation of emergency (i.e. fires) and from other maintenance activities that necessitate road building.

The local officials should become stewards of the land. They should develop an intimate knowledge base, and a connection with the land around them. However, they should not have the final say as to the fate of these roadless areas and a system ensuring decisions are made with best interest of the ecosystem in mind should be put in place. Ensuring both local and national opinions are heard on these matters is essential.

Local officials should be the first people to profess the sacredness of the land they oversee. They should be the first line of defense against those who would expose these pristine roadless areas to the affects of increased traffic, loss of habitat, and edge effects. (Individual, Walla Walla, WA - #A17698.13110)

Local forest planning should incorporate a strong Roadless Protection Policy. Logging and road building should be prohibited in the plans. Local forest planning should then focus on all the other multiple uses which occur in inventoried roadless areas, balancing them in a way that best serves the needs of today's Americans, wildlife, clean water, and ecosystems processes with the future. Consideration should be given to creating quiet trails, where motorized use is prohibited, while ensuring that there are opportunities for motorized recreation in other places—a process also known as zoning. Logging and road restoration and maintenance may continue on roaded lands as determined in the local planning process. (Individual, Sun Valley, ID - #A20628.13110)

#### **TO RESTORE NATURAL PROCESSES TO ROADLESS AREAS**

The matter concerns wilderness not forest lands, which are already considered silva/agricultural use lands. As far as these roadless lands are concerned the appropriate role of forest planners should be to get out of the way and let nature take back its role. Officious demands of forests planners only seek to upset the balance unless it includes the reintroduction of native species to their ancestral home. When it comes to these roadless areas we should not entrust our future to those who would respond to undue political pressure to abuse them for commercial exploitation such as is being designed in the ANWR and many other precious places that thieves might wish to eviscerate. (Individual, No Address - #A13403.13110)

#### **TO PROTECT PUBLIC LANDS FROM UNDUE USE**

Sight should not be lost that the Forest Service represents the people of the United States. Public forums and correspondence should not be used to let the various interests unduly influence management and protection of public lands. It is the duty of the Forest Service to primarily inform local interests of intended procedures for management and protection and incorporate worthy suggestions in the agency's plans certainly not to negotiate away the people's right to expect that public lands will be protected from undue use and exploitation by interest groups. (Individual, No Address - #A9085.15120)

#### **TO IMPLEMENT SUSTAINABLE FOREST MANAGEMENT PRACTICES**

The role most appropriate for forest planning is to implement sustainable forest management practices for the common good of ecosystems, water quality and quantity, game and non-game wildlife, recreation and scenic value for all Americans in perpetuity, with appropriate low impact (light human touch) sustainable use of forest resources and products with appropriate avoidance measures and restoration. I truly believe that our National Forests can provide to our society, while identifying key roadless areas which promote biodiversity and critical connecting corridors to sustain wildlife populations that have been omitted from the Forest Service inventories, and locating and managing ORV use in ways that provide this popular outlet while avoiding or minimizing damage to sensitive areas. (Individual, Watsonville, CA - #A6767.15160)

#### **TO DETERMINE ALLOWABLE ACTIVITIES IN ROADLESS AREAS**

In question 7 you asked of specific activities forbidden or allowed. As I previously pointed out, if the Forest Plan is used as the vehicle to deal with the roadless question I think many areas will have specific prohibitions, as well as more allowances, but may remain roadless. These should fit the expected management goals and direction. These should be decided during the Forest Planning process for each

Forest. This will make the decisions and the expectations relatively clear and hopefully compatible with the ecosystem's capability to sustain the goals that are set forth. When roads are a high-risk element for a number of reasons it seems appropriate for the area to remain roadless. When priorities in management direction require treatments that require roads they should be allowed and controlled to meet those goals. (Individual, Cambridge, ID - #A11714.13200)

#### **TO ADDRESS ACTIVITIES NOT REGULATED BY THE ROADLESS AREA CONSERVATION RULE**

New Forest plans should address activities not already regulated by the existing roadless rule. These include wildfire for resource benefits, prescribed burning, wildlife habitat improvement, noxious weed control, off-road vehicle and other recreational uses. Road building and timber harvesting are sufficiently addressed by the existing rule. (Individual, Bend, OR - #A27922.30100)

#### **TO DETERMINE ROADLESS SUITABILITY, RECREATION OPPORTUNITY, AND DESIRED FUTURE CONDITIONS**

Forest planning should only determine roadless suitability, recreation opportunity, and determine desired future condition for ecological as well as social values. Management of the roadless areas should fall within a national roadless area management strategy. (Individual, Ennis, MT - #A2249.13120)

#### **TO COLLECT DATA AND ENFORCE FEDERAL REGULATIONS**

Forest planners on the local level should be responsible for data collection and enforcement of federal regulations. Local-level forest service officials should have a say in how these areas are managed, but theirs should be one voice in contribution toward federal level enforcement and protection. (Individual, Reno, NV - #A20755.13130)

The appropriate role of local forest planning in the evaluation and protection of roadless areas should extend exclusively to the collection and distribution of data regarding threats to the roadless status of these areas. Management of roadless areas should be similarly limited. (Individual, Seattle, WA - #A21681.13200)

#### **TO IMPLEMENT NATIONAL DIRECTIVES**

Local forest plans should be done to implement national directives and to make clearly local, ecosystem-specific management decisions. However, these are "National" Forests, not state or county property. Roadless designation and overall management guidelines for roadless area management are national issues. Where local Forest Service managers can provide evidence that variation from national policy is necessary, they should present proposed modifications for public scrutiny and higher level approval; with the "public" clearly meaning all citizens of the United States. (Organization, Helena, MT - #A20874.13130)

Given the role of local forest planning in the history of declining watersheds and entire ecosystems in the Interior Columbia Basin, as well as other Forest Service and BLM-administered regions, and adding to that the vast supply of examples from every national forest of deplorable local decisions on watershed and forest management, we all should be loathe to turn crucial decisions on remaining roadless areas over to those "who know local conditions best." Relying on local managers to resist industry, local business and vociferous local public pressure to develop the national public roadless lands is the opposite of good public administration or natural resource stewardship and preservation. The appropriate role of local forest planning as it relates to roadless areas is to carry out the national policy and nationally established goals, objectives, standards and guidelines for roadless areas. There is much exaggeration of local and regional differences, but before ICBEMP was emasculated by the Supplemental EIS decision, clearly workable provision for regional climatic and other differences was made in the standards and guidelines.

Considering the current weakening of the forest planning regulations by the present national administration, I have no reason to believe that future forest plans will protect roadless areas any better than they have in the past. Almost 3 million acres of roadless lands have been lost in the last 20 years through the individual national forest planning process, and the Forest Service has estimated that an



additional 6 million acres could be lost over the next twenty years if the Roadless Area Conservation Rule is not retained. (Individual, Bigfork, MT - #A17221.13120)

#### **TO IMPLEMENT AND ENFORCE EXISTING LAWS, RULES, AND REGULATIONS**

The appropriate role of local forest planning is **to obey the laws of the land**. Although many wish we did not have a Multiple Use-Sustained Yield Act of 1960 . . . I like the thing. And I will tell you why. It is one page long, a simple document, and it says that the public's lands must not be managed for the greatest dollar return or the greatest unit output. It also says, and I quote: "The establishment and maintenance of areas of Wilderness is consistent with this Act." Therefore, I repeat, the appropriate role of local forest planning is to implement the laws Congress has given it. (Individual, Albuquerque, NM - #A19061.15161)

The Forest Service's legacy is not a pretty one. Decades of mismanagement have led to the fragmentation of forest ecosystems, liquidation of old growth forests, and the demise of many fish and wildlife species. In the Northwoods, for example, less than one (that's the numeral 1) percent of white pine remain and species such as the Canada Lynx teeter on the brink of extinction. The area that is the birthplace of John Muir, Aldo Leopold, and the location of Sigurd Olson's "singing wilderness", is unraveling after a century and a half of logging and mining. Species in the Northwoods, including the Boreal owl, wolverine, and northern goshawk are quickly disappearing. Off road vehicles run roughshod over public lands across the country. And mineral hard-rock mining projects have severely compromised the biological integrity of the region. All of these developments were made possible under the forest planning process.

Local planning should be used to determine how protective laws, rule, and regulations can be enforced, and how existing uses should be apportioned (increased or reduced; limited to certain areas and times, and not allowed on/at others) so as to meet the demands of the 90% of Americans who said they favor total protection of roadless areas. Local planning should include better and more diligent surveying of the Forests to find smaller patches (down to 1,000 acres) of roadless area, so those can be protected. (Individual, Minneapolis, MN - #A10523.13110)

#### **TO CARRY OUT APPROVED PLANS**

Part of the "appropriate role for national forest planning" includes carrying out approved plans. Local forests have evaded the law and failed to follow their own plans in many cases. For example, the Jefferson National Forest routinely fails to meet Forest Plan requirements for road densities in bear, turkey, and even some deer feature habitat and refuses to take steps to comply with the Plan (See JNF Forest Plan IV-153-55; Mand E Rpts; My appeals of the Hagan Hall, Bark Camp, Wilson Mtn., Bannister Br., Peters Mtn., and other JNF timber sales.) See also my 3/30/98 Roadless Letter, pp. 3-5 on George Washington NF mismanagement in Management Area 14 (MA 14—remote habitat for wildlife) and elsewhere in the GWNF. (Individual, Roanoke, VA - #A23081.13210)

#### **TO SERVE AS THE MEDIATOR BETWEEN INDIVIDUALS AND THE FOREST SERVICE IN IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

The local Forest Service officials should be the middlemen and women between the concerned individuals and the National Forest Service. For instance, the local officials should be communicating with individuals with inholdings within the inventoried roadless areas, trying to make sure that access to their parcel of land is not a problem. Local officials should also be in communication with all those who have preexisting mining rights in these areas, working with them to see how they can best extract the resources to which they are entitled. Moreover, local officials should determine where forests require thinning in order to prevent devastating forest fires, etc. The provisions and exceptions to the rule should be overseen and administered by local Forest Service officials in consultation with National Forest Service representatives and, of course, Chief Bosworth. In other words, the Forest Service should work with the communities affected in order to expedite the transition and work out specifics, but the National Forest Service should not cater its forest management policies to the best interests of local communities. The best interest of the country and the preservation of its forests should be the basis of any legislation. (Individual, Dallas, TX - #A17005.13210)

### **TO IDENTIFY SITUATIONS THAT MEET THE EXCEPTIONS ALLOWED IN THE ROADLESS AREA CONSERVATION RULE**

Local forest planning, including forest plan revisions or amendments should be use to identify situations that meet the exceptions adopted under the previous Roadless Rule and suggest that these exceptions be stated narrowly and explicitly, and addressed through forest plan revisions or amendments. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.13211)

### **TO IDENTIFY ROADLESS AREAS THAT ARE NOT IN THE CURRENT INVENTORY AND ROADLESS AREAS THAT NEED TO BE RESTORED**

There are 10,000 miles of roads on the one national forest that I work with most closely, the Wallowa-Whitman National Forest in northeastern Oregon. Local forest planning has not been protecting roadless areas. The Roadless Area Rule will provide for protection of the last remaining areas that are roadless. Local planning should identify areas that are roadless, and are not yet in the forest's inventory. Local planning should also identify areas that should be restored to roadless, where the only current roads are those that have been illegally made by users, without any public input, scientific review, or landscape-level considerations. (Individual, Eugene, OR - #A15651.13110)

Update roadless inventories to catch what staff missed, inadvertently or deliberately the first time around. (Individual, Somers, MT - #A11866.13210)

### **TO ADDRESS MANAGEMENT OF UNINVENTORIED AND UNROADED AREAS**

Forest planning has a role to play in determining management of these areas as allowed under the rule (for example, trail location or construction, endangered species management actions, etc.). Forest planning should also be used to address the management of un-inventoried and unroaded areas, which are not addressed by the current rules. (Organization, Boston, MA - #A23083.13210)

The local forests should have total control over designating what are true roadless areas and which areas are not. They further need to have full authority to determine road conditions, access, and route locations without costly analysis or approvals from the regional or national levels. The local forests need to have authority to remove areas or designations if inventoried roadless areas have been roaded or had vehicle access for the past 10 or 100 years. (Individual, Alturas, CA - #A28581.13110)

It is appropriate at the local level, in local forest plans, to indicate not whether (it is a given under the Conservation Rule), but how roadless areas will be preserved. Also at the local level, forest planners should examine uninventoried roadless areas and their potential for preservation and use by OHVs, which was not addressed in the national rule. (Individual, Minneapolis, MN - #A30387.13000)

### **TO DETERMINE ROADLESS AREA BOUNDARIES AND DEVELOP SITE-SPECIFIC RESOURCE PRESCRIPTIONS COMPLIANT WITH THE ROADLESS AREA CONSERVATION RULE**

NFMA provides that plans may "be amended in any manner whatsoever after final adoption after public notice . . . ." Thus, a national rule setting forth standards for the protection of Roadless areas that has the effect of amending local forest plans is fully consistent with NFMA's procedures. Just as local planning must incorporate the effect of other national-level decisions, e.g., congressional wilderness designation, Forest Service Manual and Handbook directives, and national monument designation, so, too, local planning has to accommodate national level policy decisions regarding road building and protection of Roadless areas. Unless national circumstances change, e.g., the 8 billion dollar road maintenance backlog is eliminated and social preferences for protecting backcountry wild lands are reversed, local forest planning is not the appropriate venue to revisit national Roadless policies.

On the other hand, local forest planning can more precisely determine Roadless area boundaries and develop site-specific resource prescriptions within the constraints of national Roadless area policy. (Organization, Craig, AK - #A23228.20201)

The role of local Forests is not to determine if roadless areas should be protected, but how they should be protected. The reason the public demanded a national rule to conserve roadless areas was because

local Forest Service officials were unwilling or unable to do this themselves. Once the national RACR is reaffirmed, this should provide the framework for local forest planning to determine the best means and methods for fully implementing the rule. For example, local Forests should determine which roads may need to be blocked, decommissioned, and/or obliterated. Also, boundaries for roadless areas can be located to include previously uninventoried and unroaded areas for protection. (Organization, Eugene, OR - #A21798.13110)

#### **TO CONSIDER EACH ROADLESS AREA AND HOW IT IS INTERTWINED WITH SURROUNDING LANDS**

When Big Mountain went through the NEPA process, the Flathead Forest requested us to provide them with cumulative Efforts Mode (CEM) for an area encompassing approximately 100 square miles. Our permit area covers 2300 acres. We did this, and it has been a valuable tool for both our staff and Forest Service staff. This process forces everyone to consider all the resources, uses, and values when considering an array of alternatives. The Forest Plan could be the venue to consider each of these proposed roadless parcels, and how they are intertwined to surrounding lands. (Permit Holder, Whitefish, MT - #A20669.13220)

#### **TO IDENTIFY LOCAL RESOURCES THAT MAY MERIT ADDITIONAL PROTECTION**

As provided by the Roadless Rule, the appropriate role for local forest and grasslands planning is to identify local resources that may merit additional protection within or adjacent to roadless areas, such as by infrastructure retirement or site restoration. Local plans should also identify roadless areas that were omitted from current Forest Service inventories. Local planning processes can also develop improved management plans for the existing road network, to be implemented using resources that may otherwise have been expended developing roadless areas. (Organization, Reston, VA - #A21625.13200)

#### **TO ADDRESS MANAGEMENT OF NATIONAL GRASSLANDS**

Management of the National Grasslands should include decisions made through the forest planning process, which utilizes local knowledge and best available science. A decision based on one national directive negates the well-established planning process and collaborative approach used in the forest planning process. The Roadless Rule now under comment demonstrates a lack of information in formulating the rule. (Governor, State of North Dakota - #A22065.13110)

The National Grasslands contain a checkerboard pattern of state, federal and privately owned surface and mineral acres that the rule does not recognize or consider. The Grasslands contain a host of diverse values including oil and gas production, ranching and tourism all of which are integral parts of the economic and social fabric of the state and western North Dakota. The management planning process provides the best method of addressing the needs for accessing diverse properties and accommodating the values and uses associated with the Grasslands. (Governor, State of North Dakota - #A22065.13200)

#### **TO FOCUS ON EDUCATION AND RESEARCH**

Local forest planning needs to focus on education and research to try to sustain the forest that we have left. (Individual, No Address - #A17946.13200)

#### **TO EDUCATE COMMUNITIES ON THE ECOLOGICAL IMPORTANCE OF ROADLESS AREAS**

The appropriate role of local forest planning is to educate planners and communities as to the importance of roadless forests to both biodiversity and ecosystem functions that sustain fisheries and provide flood control (among other ecosystem services). Local communities should be educated that remaining roadless habitats represent a vast minority of Forest Service lands and that protecting them merely helps to balance roaded areas—those that already contain an excessive 400,000 miles of roads. (Individual, Davis, CA - #A30523.15163)

**261. Public Concern: The Forest Service should recognize that the appropriate role of the forest planning process cannot be determined until changes to the Planning Regulations are finalized.**

The “appropriate role” of the planning procedures required by NFMA is impossible to determine since the planning regulations have been recently revised and then subsequently temporarily withdrawn. It is impossible for the general public to answer this question until the Planning Rule changes are finalized.

Since the primary purpose of any NEPA process is full public disclosure of proposed changes and their impacts on the human environment we would advise the agency to withdraw the rule until the planning regulations are finalized. (Organization, No Address - #A30533.20000)

## Working Together (Question 2)

**Question 2: Working Together.** What is the best way for the Forest Service to work with the variety of states, tribes, local communities, other organizations, and individuals in a collaborative manner to ensure that concerns about roadless values are heard and addressed through a fair and open process?

This section includes three subsections: Adequacy of Public Involvement Processes/Methods, Public Involvement in Decisionmaking, and American Indian Rights and Interests.

### Adequacy of Public Involvement Processes/Methods

#### Summary

**General Comments** – A number of respondents advise the Forest Service to reevaluate its public participation processes to ensure fairness and honesty. People suggest methods to enhance the public participation process, ranging from using mass media, to revising language, to emulating the processes of other agencies or field unit such as the Bureau of Land Management and the White Mountain National Forest. Some comment that the Forest Service should not claim that the amount of public input received on the Roadless Area Conservation Rule constitutes quality public involvement. However, the greater part of responses regarding public involvement processes assert that the public involvement efforts for the January final Roadless Rule were adequate.

**Adequacy/Availability of Information** – Most who comment on this topic address the need for adequate public notification of pending management proposals. Writers furnish various suggestions to address this need including notifying people on Forest Service mailing lists and posting information on web sites. Along these same lines, people also suggest establishing consistent terminology and reporting procedures for advance notices. Some state that the Forest Service should provide site-specific information in order to allow informed comment. One organization reminds the Agency that decisions relative to the designation of roadless areas cannot be made in a vacuum. They believe that there must be access to information regarding specific inventories before reaching consensus.

**Adequacy of Public Meetings** – A number of respondents request that the Forest Service conduct another round of public meetings. Some request fewer, more productive meetings. People also suggest conducting public meetings that are, what they consider, legitimate, that comply with federal rules, that are held at convenient times and places, and that discuss local areas of concern and possible modifications to the Roadless Area Conservation Rule. Some comment that the Forest Service should conduct as many public meetings as were conducted for the Rule. Others request that the Forest Service improve citizen participation in public meetings.

**Adequacy of Comment Period/Timeframe** – Some comment that the Forest Service should allow a more adequate comment period for the Advance Notice of Proposed Rulemaking. As one

individual remarks, the comment period of 60 days is believe to be inadequate and unfair to the American public, and reflects requests for extensions, —some to 90 days, others to as much as 240 days. Another respondent suggests that the final Rule had so many deficiencies that an additional comment period would be insufficient. Several others assert that extending the comment period to seek out a more diverse public sentiment is a way of killing the roadless proposal.

Just as respondents comment on the adequacy of the comment period, they comment on the adequacy of the time frame for rule development in general. Some people suggest that the time frame for development of and comment on the Rule was adequate while others say it was not. Those who state that the timeframe was adequate say that enough time has been spent asking for public input and that more delay would only allow more harm to the environment and undermine the Rule. Those who claim the timeframe was inadequate state that the process was used to rush the Rule through without enough attention to detail, as is evidenced, they claim, by poor data and numerous mistakes.

**Use of Science/Best Information Available** – The use of science in decisionmaking is a topic of comment to a number of respondents. One individual states that the Agency should not be biased by user needs but by good, reliable, peer reviewed science. People also provide suggestions as to how the Forest Service should best incorporate science into decisionmaking and why science should take precedence. Several respondents advise the Forest Service to heed the counsel of scientific committees. Others comment that opinions submitted by the public should not be accepted as scientific fact and that the Forest Service should scrutinize the studies submitted by representatives to validate the information.

**Adequacy of Public Comment** – Many assert that the opportunity for and volume of public comment on the Roadless Area Conservation Rule was adequate. Some suggest that there was sufficient local input on the Rule as well, and one individual requests the Forest Service explain its assertion that there was inadequate local input. A few respondents suggest that the only groups objecting to the adequacy of the public comment process for the Rule are those that don't want it.

**Analysis of Public Comment** – Some respondents comment about the way public comments are analyzed and suggest that they should be adequately and quantitatively analyzed and reported. One organization states that it was disappointed in the review process of comments on the Roadless Area Conservation Rule] and found that the manner in which the comments were analyzed and reported made it extremely difficult to determine the desires of the respondents. Suggestions to improve analysis include accurately tabulating comments, creating transcripts of public meetings, verifying the validity of organized response letters, and disclosing the details of late submissions.

**Scope of Public Comment to be Considered** – A number of respondents advise the Forest Service to respect the comments already received for the Roadless Area Conservation Rule, frequently suggesting that those comments be considered along with those submitted for the Advance Notice of Proposed Rulemaking. Some suggest that the Forest Service should disregard organized response letters, while others suggest it not accept mail-in public comments.

**Consideration of and Response to Public Comment** – A number of respondents assert that the Forest Service should consider all comments. One individual believes that all comments should receive sincere consideration, regardless of whether they are form letters. Some suggest that the

Forest Service should give all parties' comments equal weight while, on the other hand, others provide suggestions on how the Forest Service should differentially weigh public comments. Suggestions include giving greater weight to local and resource-dependent interests; giving less weight to organized response letters; and giving greater weight to professional foresters, wildlife biologists, and fire managers. Some also suggest that the Forest Service should evaluate the consideration it ought to give to the majority opinion—and believe the Agency should give serious consideration to the majority opinion (see also Chapter 3: Competing Values/Limited Resources (Question 9): Managing Competing Interests: *Will of the Public/Elected Representatives*), while others say the comment process should not be turned into a vote. Finally, some comment that the Forest Service should not only adequately consider public comment, but should adequately respond to it as well.

### *Adequacy of Public Involvement Processes/Methods General*

#### **262. Public Concern: The Forest Service should reevaluate public participation processes.**

##### **TO ENSURE FAIRNESS**

I feel strongly that President Bush's 60 day notice period is too short of a time period for the public to make informed comments, or to have enough time to hear about the reopening of the comment period. Instead, I am concerned that it favors wealthy corporations and special interests with the resources necessary to quickly mobilize a desired message in a short amount of time. First and foremost, I believe that the process itself needs to be evaluated for fairness, or the final outcome will represent the interests of institutions and corporations with money and mobilizing power, not necessarily those of the public.

I feel that your biggest mistake would be to reconfirm in the minds of Americans the suspicion that the government and the USFS doesn't work for them, but works for large, powerful corporations and special interests. Perhaps you can devise a good series of soundbytes and marketing strategies to convince most of the people that you have done everything you can to get their input, but people are getting wiser to and less patient with such tactics. I think you may be better off admitting the limitations of a 60 day comment period, 'scientific' forest management, and 'local collaboration', and working toward re-winning the public trust, with a more democratic national forest planning process. (Individual, New Haven, CT - #A706.14400)

##### **TO ENSURE HONESTY**

One thing you could do is modify your vigorous national public relations campaign so that it's honest and not misleading to the people of this nation who can't look out their window and see, with their own eyes, what "management" in the national forests amounts to (e.g. roads and logging). (Individual, Libby, MT - #A8346.14120)

Being forthright and honest (what a concept!) with all those groups involved with certain areas of the forest should be a big step in the right direction. (Individual, Lopez Island, WA - #A15240.15000)

#### **263. Public Concern: The Forest Service should enhance the public participation process.**

##### **BY ENSURING THAT IT IS OPEN AND COMPREHENSIVE**

As with other Forest Service initiatives and plans, the agency too often inappropriately shrinks the decision space before initial scoping. In line with the language of the 2000 revision to the NFMA forest planning rules, improved public involvement includes more discussion of the issues with the public in various forums prior to a formalistic scoping document released for public comment.

If nothing else, the agency needs to use a more comprehensive, open and transparent public involvement process than it used in promulgation of the January 2001 rule the District Court of Idaho felt compelled to enjoin. (Business or Association, Washington, DC - #A17887.15150)

#### **BY ADEQUATELY PUBLICIZING PROPOSED ACTIONS AND OPPORTUNITIES TO COMMENT**

Improve communication with communities, and forest user groups, that are directly affected by Forest Service actions. I am most upset when closures, or changes, are made in my local forest (San Bernardino, Cleveland . . . ) and then to find out that a well funded national activist group had petitioned for these closures months ago. The US Forest Service should provide better local notification of planned meetings, or when public comments are requested for local forest management planning. California Prop. 65 required using hazardous chemicals to print in the local paper large vicinity maps and descriptions of operations. Why can't the Forest Service do the same thing for proposed changes? (Individual, Irvine, CA - #A937.14100)

Although the Forest Service does make attempts to solicit input from the public, these attempts are not well publicized. Local administrators should try harder to solicit local opinion regarding land use issues. This should include the use of local newspapers to publicize these issues, provide means of gathering public input, and provide notice of public meetings concerning land use issues. (Individual, Saint Louis, MO - #A629.14100)

"Hearings should be held in areas most effected by your regulations. In addition, you should inform all of those that own land within a 50 mile radius of all potential land that is being considered for any new designation, to be given a thorough explanation of your intentions in specific language (without 'legalese') so the average person can understand the path you are considering and why you are considering it. I know you will inform Native American Groups, the Sierra Club, etc., of your intentions since these groups seem to be more important to you than 'regular citizens' but you can do a better job letting the rest of us know what your intentions are, and how you intend to achieve them." (Individual, No Address - #A834.14100)

A better effort should be made to publicize this opportunity. (Individual, Arlington, MA - #A1152.14120)

We have precious little left of our natural resources to protect as a direct result of the public being left in the dark while laws designed to benefit special interest groups have been passed without the public's awareness. This has to stop. This is our land and we have the right to protect it and to designate how our tax dollars are spent in the protection and maintenance of our priceless and irreplaceable natural resources. (Individual, Monroe, GA - #A4875.15000)

#### **BY UTILIZING MASS MEDIA**

Involve all interested parties in the process adequate opportunities to offer their views and help to define the issue. The Forest Service should hold public hearings and entertain written comments during the planning process for the individual roadless areas. Notice by the Forest Service should include notification not only by print media, but [also] by mass media that includes local radio and TV stations. Public Service Announcements and/or News Bulletins should be used. All of the public should be given ample opportunity to be informed that planning for management and use of nearby roadless areas is taking place and will affect the future of these National Forest areas. (Individual, Edgewood, NM - #A5638.15150)

The impact of the roadless rule must be made known to the entire public by better use of the news media. As it is now, you are only getting feedback from a small percentage of the public that learned about it, or initiated it, as part of a special interest group like the Sierra Club. The majority of the public does not know that this rule is being reviewed right now or how the result will impact their lives. (Individual, Fountain Hills, AZ - #A5990.14000)



**BY ACCEPTING INPUT THROUGH ALL MEDIUMS OF COMMUNICATION**

Accept input via any and all methods. Some individuals communicate better through particular means than do others. Each person's voice should be heard. In particular, those parties who are not outspoken in their communities, due to personality, or simply being outnumbered, such as in a situation where most of their neighbors and friends work in the timber industry), will not be heard via a town meeting type of format. (Individual, No Address - #A1702.15100)

**BY USING AN INFORMAL METHOD OF COMMUNICATION**

[Question 2] Working Together: Informal communications rather than structured communications provide better information to the local officials (Forest Supervisor) and reduce the cost. (Individual, No Address - #A16447.14120)

**BY ADEQUATELY SOLICITING PUBLIC INVOLVEMENT**

The Forest Service under Chief Dombeck did a wonderful job of soliciting public comment on the Roadless Rule last year. I was pleased to testify in support of it, as did 95% of the people who attended the hearing in New Hampshire that I did. In fact, the only ones who did not support the rule were the local politicians and the timber companies. Is the Forest Service going to conduct an equally extensive solicitation of public comments for the current attempt to reverse the Clinton roadless rule? Or are they going to try to do a dirty, back room deal between lawyers in the same way as the dealings between the so-called Justice Department and the snowmobile manufacturers in order to reverse the Yellowstone snowmobile ban? (Individual, Portland, ME - #A1461.14000)

How do you know that environmentalists won't flood your office and E-mail with responses and drown out "real" people (like me) and the voting public? You do need new and varied public comment. (Individual, San Diego, CA - #A1614.14000)

It is difficult to keep the entire public involved at every stage of decision-making but all attempts to do so should be made. Public meetings, solicitation of commentary and even referendum are methods of maintaining that kind of involvement. It is my firm belief that commentary and even referendum are methods of maintaining that kind of involvement. It is my firm belief that the citizenry will help promote good decision-making if they get the chance to remain involved and are listened to. So often though, interests that hold economic values above those moral [values] see to it that the public is not fully informed or involved in this crucial kind of decision-making. (Individual, No Address - #A1728.14000)

**BY USING SURVEYS TO SOLICIT PUBLIC COMMENT**

We feel the Forest Service should take advantage of objective survey methodology to better gauge public opinions. Our experiences with such surveys have been extremely beneficial. Survey results often are much different than comments from public meetings and help our agency to objectively manage wildlife resources, habitat, and competing uses. (State Agency, Social Circle, GA - #A22054.14120)

You have meetings in the evening after the working class has worked all day! They stay home with their family or friends, not out of FS meetings; Mostly local people believe that their voice does not matter, does it? Send out a mail survey to local P.O. Box holders! (Individual, Bethel, MN - #A19708.14100)

**BY CONDUCTING NATIONWIDE POLLING**

Public hearings are often not the best forum for public input. However, where the Forest Service is developing national policy it is impossible for the taxpayers in New Jersey to sit down with loggers from Libby in a meeting room every week. Nor is it appropriate to assemble a group of "stakeholders" in some far flung rural community to dictate the goals for a forest supported by the American people as a whole. The Forest Service is a trustee of these lands, and as trustee has a responsibility to see that its lands are managed properly. The only way that the Forest Service can ascertain whether it is doing the job it has been asked to do is polling the American people in general. Tools may be available, such as the Internet, for the Forest Service to facilitate a "discussion" of ideas on a national basis. The question

remains whether the outcome will differ under such a scenario than what has already been stated to the Forest Service in the first round of comments. (Individual, Bozeman, MT - #A17508.14200)

#### **BY USING SIMPLE ENGLISH RATHER THAN AGENCY JARGON**

The Forest Service planning process, including the process for the protection and management of inventoried Roadless areas is not very user-friendly. Agency personnel rely heavily upon the use of jargon and acronyms that are unfamiliar to all but those who make a career out of forest planning. (Organization, Maryville, TN - #A8754.14100)

Please refrain from using words like “collaborative effort” and “consensus groups”, etc. A meeting is a meeting—call it that. Use simple English to communicate with the public. (Individual, Libby, MT - #A10531.14120)

#### **BY GIVING DUE CONSIDERATION TO ALL RELEVANT INFORMATION AND PERSPECTIVES**

I believe that the key to a collaborative relationship is valuing a variety of perspectives and respecting the validity of opinions that differ from the perceived goals of the Forest Service. Too often Federal agencies have planning sessions with public and private partners in which it appears that the goal is convincing the partners to agree to an agency goal rather than to improve the plan by giving due consideration to all relevant information. (Individual, Atlanta, GA - #A873.15162)

#### **BY EMULATING THE BUREAU OF LAND MANAGEMENT**

The best thing about this public comment process that I am participating in is that I can e-mail it in and it will be visible to anybody who wants to read it. I am just like the redneck grandstanding in a public meeting. I say my privately arrived at piece and he says his and there is hardly a chance for us to come together on the issue. The BLM seems to be better at canvassing the public will. See how they do it. (Individual, No Address - #A22183.15165)

#### **BY EMULATING THE WHITE MOUNTAIN NATIONAL FOREST**

The system of public involvement processes that the White Mountain National Forest is using for its plan revision is a good example of how a local public involvement process should work. (State Agency, Concord, NH - #A28779.14000)

#### **BY REQUIRING PARTICIPANTS TO INTERACT**

But for future forest planning, I like processes where people are randomly seated around tables, are provided with good information, and have to interact with each other to come up with ideas. Public hearings that allow people to grandstand can be polarizing and counterproductive. (Individual, Northfield, MN - #A22395.14200)

### **264. Public Concern: The Forest Service should not confuse the large number of public meetings held and letters received for the Roadless Area Conservation Rule as quality public involvement.**

#### **AS MANDATED BY THE NATIONAL ENVIRONMENTAL POLICY ACT**

Fundamentally, the state of Utah believes that the rulemaking is outside the bounds of authorizing legislation, and is outside the bounds of any definition of a proper and reasonable public process. The state understands that the previous administration, and many citizens, have loudly proclaimed that the process to prepare and evaluate the Roadless Area Conservation Rule was, once revealed, very open and “public,” and therefore complied with the requirements of the National Environmental Policy Act. The Department, under the previous Administration, certainly arranged for a lot of meetings the public could attend, and allowed for written comment by the public. Unfortunately, many of those meetings in Utah, and I am told those held elsewhere, provided little or no substantive information to the public which attended. The state believes that the information presented, the manner of its presentation, the lack of localized examinations, and other factors, requires the Department, under the current administration, to find that the process did not meet the standards of the “hard look” required by NEPA. The [state] believes the process is not valid, and must not be given any further consideration, or must be

significantly reworked in order to achieve compliance with NEPA and Forest Service organized legislation. The Department must not confuse the large quantity of public meetings held on this proposal, or the large number of letters submitted, for quality analysis and adherence to law. (State Agency, Salt Lake City, UT - #A20742.20203)

**265. Public Concern: The Forest Service should recognize that public involvement efforts for the Roadless Area Conservation Rule were more than adequate.**

The U.S. Forest Service conducted a fair and open public process, including 34 meetings or hearings in Montana communities. Public debate was open, healthy and vigorous. Newspapers and press were full of roadless news, public hearing schedules, editorials, columns and letters-to-the-editor.

In contrast to this (ANPR) process—with no hearings to date—scoping for the roadless rule began with public hearings on every national forest in Montana between November and December 1999. This process could be viewed as a continuation of [the] public involvement . . . process used to develop the interim rule in 1998.

After the draft EIS was published in May 1999, a second round of public meetings, open houses with opportunities to discuss and comment on the draft, were sponsored on every national forest and many smaller communities throughout Montana.

Finally, public involvement in the proposed national forest roadless conservation policy reached its peak in June 2000, when 15 additional public hearings were conducted in 10 Montana communities.

The process used to develop the roadless rule—through open public meetings—was a model of public involvement. Leave the rule. Move forward, not backwards. (Organization, Helena, MT - #A21370.10153)

Since BREDL was founded we have advocated that governing bodies listen to legitimate public concerns. In our 17-year history we have encountered numerous situations where the public was shut out. However, this is not one of those occasions. On the contrary, the Forest Service went through the legal, fair and open process in gathering public comments. We commend the Forest Service in providing ample notice and opportunity for the public to comment. Over 600 public hearings were held nationwide including at least one in every national forest. No other federal agency has gone to such positive lengths in providing information and gathering public comments. In the future, we can only hope that all drafts of important rules from all agencies utilize the process as effectively as the Forest Service did during the Roadless Area Conservation Rule process which ended in January 2001. (Organization, Roanoke, VA - #A10565.10153)

Assertion: decisions about roadless areas should result from an open and fair process and address concerns (pp. 3 and 4). In fact, the ANPR contains no basis whatsoever for assuming that the Roadless Rule process was not open and fair, and fully responsive to concerns. The ANPR does quote at some length from the District Court's opinion in Kootenai Tribe, et al v. Veneman to the effect that the comment period was "grossly inadequate" (p. 5). The errors in that opinion are too manifest to ignore, however. The opinion faults the DEIS process for an absence of maps, too little comment time, inadequate public meetings, and lack of response to public comments. In fact, as the agency well knows, the DEIS provided maps of roadless areas (except some small ones it later dropped from its proposal), and it allowed 69 days for comment rather than the legally required 45. Moreover, the agency nationwide held hundreds of public meetings, and prepared an entire volume of responses to comments, volume 3 of the FEIS. The opinion, in attacking the DEIS process, confuses it with the scoping stage 6 months earlier, for which there is no legal requirement of public meetings or responses to comments, repeatedly citing as evidence of perceived DEIS process flaws testimony that dealt only with the scoping phase. Had the Forest Service defended itself against this lawsuit even perfunctorily, it would have had the opportunity—as well as the obligation—to correct these factual errors in court. Having declined to do so, it is hardly in a position to rely on the judge's misapprehension here. (Organization, Olympia, WA - #A20145.10155)

**266. Public Concern: The Forest Service should recognize that the public involvement process under the National Environmental Policy Act is biased in favor of local interests.**

The NEPA process, which has been used extensively in national forest planning, is usually biased in favor of local interests due to the choice of public involvement media. By allowing important decisions regarding roadless status and associated values to be made locally on a case basis, there is limited opportunity for broader national concerns over conservation, protection for future generations, biodiversity, water quality etc, to be articulated. People who live far from a given forest are shut out of the process. The Forest Service needs to awaken to the fact that these are National Forests, and as such, requires broad, national public involvement for important issues like roadless area integrity. (Individual, Lacey, WA - #A17998.15100)

***Adequacy/Availability of Information***

**267. Public Concern: The Forest Service should adequately notify the public of pending management proposals.**

**NOTIFY PEOPLE ON ITS MAILING LIST OF PENDING MANAGEMENT PROPOSALS**

Only by chance did I read in a July, 2001 newspaper about the Forest Service (FS) renewed request for comments on roadless areas long after the final rule of Jan 12, 2001 was issued. This demonstrates a problem in the rulemaking process. A National Forest user such as myself, in the FS files, is not informed of proposed rules except through the Federal Register. I do not get the Federal Register, I do not have time to wade through that voluminous publication for pertinent proposals, and I do not belong to any organization that would inform me of comment periods for such proposals. I regularly receive mailings from the BLM warning of upcoming deadlines for paperwork. Why can't I also receive from the FS or BLM warnings about pertinent Federal Register proposals? At least extend comment periods for significant proposals to many months. (Individual, Leamington, UT - #A8030.15150)

**MAINTAIN A CURRENT MAILING LIST**

Many of the decisions that were made by the local forest planning management of inventoried roadless areas were made to satisfy the pressure from the powerful environmental groups. Let us hope that this is not a repeat performance. This includes a current mailing list. For some unknown reason there were some of us who were dropped from the mailing list. This presents the problem of not being aware of the changes they are undertaking. They now plan 4 miles of new road in the Kinky Creek area and the first I knew of it was when I read it in the newspaper. It is hard to convince many that I have talked to that this was not intentionally done. When things like this happen it makes it very difficult to have any faith in the management of our forest. (Individual, Rock Springs, WY - #A5695.12200)

**NOTIFY STUDENTS THROUGH UNIVERSITY CONTACTS OR RANGERS**

We are a group of concerned students from James Madison University located in Harrisonburg, VA. We were shocked to hear that approximately 2.6% of the United States land base was about to be auctioned off to industry. We couldn't believe that such an important issue had been unknown by a vast majority of JMU students. We then contacted other students from across the country asking them about this proposed policy change. Not one student was aware of such a proposal. The Forest Service should consider broadening the ways of public announcement. Ways of reaching out to students would be contacting universities, public broadcasts, or local speeches by park rangers in the area. (Individual, No Address - #A30028.14120)

**POST ALL INFORMATION ON LOCAL AND NATIONAL WEB SITES, INCLUDING OPPORTUNITIES TO RESPOND**

USFS should post all information on local and national web sites. (Organization, Reno, NV - #A8730.14120)

Design a web site in order to allow everyone to post their comments instantly by subject; match and search similar recommendations and comments from all comments submitted from everyone in order to verify a proper accounting of how many Americans support a particular solution. (Individual, Jefferson, OR - #A775.14130)

Perhaps it is possible, but I could not find a way to respond to your questions via your website. My impression was you are soliciting public opinion for YET MORE STUDY on opening wilderness areas to “mis”management. If my impression is correct, I find it very hard to believe you wouldn’t make it easier for the public to comment, i.e., put the questions on your website with a link for people to respond directly to a question as they read it. Why wouldn’t you take advantage of technology to help guide policy making in this area? (Individual, No Address - #A5196.14130)

#### **ENSURE THAT THE RESPONDING EMAIL ADDRESS WORKS**

I am glad to see that the President has reopened comment on the USFS’s roadless proposal. I sent comment to the USFS during the previous comment period, but my comments were returned as undeliverable. I rechecked the E-Mail address and it was correct as advised. I wonder how many others were rejected. (Individual, Stayton, OR - #A1042.14130)

I could not get your e-mail to work so I am faxing the reply! (Individual, Reno, NV - #A1184.14130)

### **268. Public Concern: The Forest Service should address the biased and inadequate information on the roadless area homepage.**

Further biased material is found through the link to “Summary of Key Information” on your roadless area homepage. The link leads to a document entitled “Appendix B—State-by-State Summaries of Key Information,” which is a table. I comment here on this table as it relates to Alaska, since that is the part of the national forest system that I know best.

One column of the table lists “Percent of NFS land that is Inventoried Roadless Area.” For Alaska, the percentage is 66.9 percent. This is an absolutely meaningless figure in regard to logging, and is extremely misleading to members of the public that rely on this table in preparing comments (or forming opinions) on the proposed changes to the rule. The vast majority of this 66.9 percent of the Tongass and Chugach National Forests is land that is unforested or is covered with forest that has no commercial value!

The next column is “Estimated Reduction in annual Harvest from Inventoried Roadless Areas.” In fact, this figure has little meaning from an economic perspective. What would have been meaningful in its place would be the annual amount of timber that could be obtained with inventoried roadless areas removed from the timber base.

A further problem with the table is its last column, which purports to show “Potentially Affected Areas.” In the case of Alaska, these “areas” are all communities. The implication is that these communities would be affected by the reduction in number of jobs shown in the adjacent column and by the reduction on timber yield from roadless areas as shown in the other column. In fact, most [if] not all of these communities would benefit in the long term from protection of roadless areas. For example, Metlakatla has opposed the project (now for a ROD) in the roadless area on Gravina Island, which the people of Metlakatla rely upon for subsistence resources. Hoonah and Klawock have had their watersheds and viewsheds logged by Native corporations as well as the forest Service, and protecting federal roadless areas near these communities will provide the highest long term benefit. In summary, the Forest Service appears to have done everything it possibly can in this process to skew the results of public comment to be those which the Bush administration desires. I am flabbergasted by this blatant tinkering with the ballot box (as it were) of the public process, although after the shenanigans in Florida in the presidential election what else should I have expected? Nonetheless, I’m mad as hell about how this so-called public process is being conducted. (Individual, Sitka, AK - #A24495.14130)

**269. Public Concern: The Forest Service should establish consistent terminology and reporting procedures for advance notices.**

RACR should establish a common terminology and reporting procedure so advance notices in Quarterly Reports and NEPA documents fully explains when and why activities are proposed in Roadless Areas. . . there is a history of inadequate and divergent approaches to public information sharing in proposed action in Roadless Areas. (Organization, Boise, ID - #A20363.14120)

**270. Public Concern: The Forest Service should provide site-specific information.**

**TO ALLOW INFORMED COMMENT**

The proposed rule set prohibitions on construction and reconstruction of roads, but **did not propose to prohibit timber harvest in the regulated areas**. The proposed rule also **deferred consideration of including the Tongass National Forest**. The public was not given the appropriate opportunity to comment how a timber harvest prohibition would affect them or their local area. The Forest Service has claimed that the public had ample opportunity to comment on the possibility of a prohibited timber harvest because it was generally discussed in the Draft EIS. 66 *Fed. Reg.* 3257. However, the Draft EIS listed several timber harvesting prohibition alternatives and did not adequately analyze the environmental and social impacts of those alternatives on each individual unit of roadless area identified by the proposed rule. **Due to the existence of several alternatives, the lack of insufficient analysis, and a severely limited comment period, the public in fact, did not have ample opportunity to adequately comment on the possibility of a prohibited timber harvest.**

On November 17, 2000, the Forest Service announced the availability of the Final EIS. Like the Draft EIS, the Final EIS did not adequately analyze the impacts of the proposed rule on each individual Roadless forest unit as required by NEPA. The analysis instead, was very broad and general. **The Final EIS also encompassed 58.5 million acres of land - a substantial increase of 4.2 million acres over the amount addressed by the Draft EIS.** For example, large chunks of land were added to the Final EIS in areas such as the Chugach National Forest in Alaska (1.9 million additional acres) and in the Tongass National Forest in Alaska (860,000 additional acres). **The public was not notified that these areas could be included in the final analysis and therefore were never afforded an opportunity to comment.** (Business or Association, Washington, DC - #A28689.10135)

Decisions relative to the designation of roadless areas cannot be made in a vacuum. Rather, access to information such as whether a specific area has been inventoried for both classified and unclassified roads is critical in reaching a consensus and the appropriate policy. This information must be made available to the general public in order that a consultative process among various interests parties can be undertaken prior to a final decision on whether a particular area should be designated as Roadless. A basic tenet of our democratic process is information to its citizens. Those entrusted with government have a responsibility to ensure that such information is widely disseminated so that an informed citizenry can make informed decisions. (Organization, Huntsville, AL - #A13542.14100)

**SHOWING THE RELATIVE IMPORTANCE OF SPECIFIC ROADLESS AREAS**

I believe that the IRAs on each National Forest should also be displayed as to their relative importance and value from a Statewide (FS), Regional (FS) and National (FS) perspective (i.e., higher or lower than average number of acres of roadless areas) so people can grasp the importance of the IRAs on the Forest they live on or adjacent to, or are concerned about. (Individual, Libby, MT - #A2301.45100)

**271. Public Concern: The Forest Service should not use the Federal Register to announce comment periods.**

Why the Federal Register? Hardly anyone reads it. Was this an effort to hide this issue or what? Fortunately, the media do check this out and let us know. (Individual, Stevensville, MT - #A779.14110)

## *Adequacy of Public Meetings*

### **272. Public Concern: The Forest Service should conduct public meetings.**

Keep the doors of communication open and encourage public involvement through meetings. (Individual, No Address - #A583.14200)

Open public meetings go a long way to insure all get heard and also help to understand other's viewpoints. (Individual, Olympia, WA - #A615.14200)

The Forest Service has never worked effectively with individuals and groups with strongly competing views. However, more public hearings where the Forest Service personnel actually listen to the people in attendance would be a first step toward effectively working with individuals and groups. Listen to the arguments, add good science and make good decisions based on that good science. (Individual, Miami, AZ - #A880.14200)

#### **THAT ARE LEGITIMATE**

The best way to involve all parties in the process would be for the FS to simply hold legitimate public hearings before any decisions are made that would impact the recreational public. . . In the formation of the original rule meetings were held, but the public perception of these hearings was that the FS was just "going through the motions" in fact, barely tolerating the motions based on the meetings I attended, with the outcome having already been determined. It is essential that the stakeholders in forest use policy decisions be fully involved in the formation of those decisions and that the agency try to rebuild the trust with the recreational public that has been lost due to this debacle. (Individual, Denver, CO - #A5433.14200)

#### **THAT COMPLY WITH FEDERAL RULES**

The Meetings that were held on this matter were not in compliance with any Federal rules, as we know them. Staggering of meetings for information and written comments and the actual public hearings is offensive if not illegal. Many people here in Nevada have to drive over 100 miles just to attend. I attended the hearing in Austin on 6/13 and heard many participants ask questions that went unanswered followed with a comment that information was given out at the earlier meeting and that that meeting was reserved for a three minute testimony. The three-minute rule was another slap in the face for 1 gentleman that indicated that he had to drive for 2 hours to speak for 3 minutes. (Individual, Austin, NV - #A15794.14200)

#### **IN A FAIR AND IMPARTIAL MANNER**

The best way for the USFS to work with States, tribes, local communities and other organizations and individuals is to listen to, and take into account, their views and uses. The USFS should stop dividing the meetings into splinter groups where different subjects are discussed. This only causes distrust of the USFS and casts doubt as to the value of the public meeting process. (Individual, Mount Hood Parkdale, OR - #A1084.14200)

If the Department of Agriculture chooses to propose revisions to the roadless area conservation rule, we advocate including additional hearings in the vicinity of each Forest supervisor's Office, Region Office and Washington Office. These hearings should be conducted in a fair and open manner to assure that representatives of states, tribes, local communities, other organizations, as well as individuals will be heard. (Civic Group, Roanoke, VA - #A1713.14200)

#### **AT CONVENIENT TIMES AND PLACES**

The best way for the US Forest Service to work with states, tribes and local communities is to initiate and maintain a continuing dialogue with a broad section of individuals representing the above mentioned groups. It is important that any and all meetings be held at a TIME and PLACE convenient for all individuals to attend and participate. Any meeting notification should be done far enough in advance to allow for proper planning and attendance by those groups. Local Foresters should use Friends of the

Forest Groups as much as possible and communicate directly with groups that presently have access to and a high level of interest in the forest. Those groups should include but not be limited to: snowmobile clubs, camping clubs, timber related organizations, fishing groups, bird watchers, hiking groups, biking groups, horseback riding groups, etc. (Business, Haslett, MI - #A4861.14200)

#### **WITH ADEQUATE NOTICE**

I have read where there were 600 public hearings and 1.6 million comments in which 90% of the people said they wanted to preserve the National Forest Roadless Areas. I don't know when or where these hearings were held because I never heard of them. Evidently they were by invitation only and strictly partisan. (Individual, Rydal, GA - #A5408.10132)

Although many public meetings were held, they were often announced last minute and there was little time to prepare comments, particularly specific comments as there was little specific information. (Individual, Coeur d'Alene, ID - #A7914.14100)

#### **THAT DISCUSS LOCAL AREAS OF CONCERN**

[Question 2] Public hearings that discuss localized areas of concern and not forest wide proposals. (Elected Official, Sanpete County, UT - #A15546.14200)

#### **THAT DISCUSS POSSIBLE MODIFICATIONS TO THE ROADLESS AREA CONSERVATION RULE**

I would urge that the Rocky Mountain Region of the Forest Service convene a public hearing regarding possible modifications of the roadless rule sometime before the end of the public comment period on September 10, 2001. Given the importance of this rule and the ramifications of possible modifications, it is essential that the Forest Service provide an opportunity for the public to express its views in much the same way that it was provided at the time of its initial development. (United States Representative, Colorado - #A21467.14000)

#### **INSTEAD OF SOLICITING ONLY WRITTEN COMMENTS**

Through public, open meetings such as those previously held for the Roadless Rule. Do not use the instant approach (a single written comment period) to justify adulterating the roadless rule or other policies of national interest. (Individual, West Glacier, MT - #A5946.14000)

### **273. Public Concern: The Forest Service should conduct as many public meetings for the Advance Notice of Proposed Rulemaking as were conducted for the Roadless Area Conservation Rule.**

In this current ANPR process the Forest Service has asked the public for responses to ten questions. We question the validity of this approach. The public may not have the information or background to make informed responses to open-ended questions. This weights the process towards industry and local government (which is often dominated by business interests). The proper procedure would be to present the public with a proposal and ask the public to comment, providing the maximum opportunity for them to do so. This is precisely what the Forest Service did under former chief Mike Dombeck during the Roadless Area Conservation Rule public process. If the current Forest Service leadership wishes to make changes to the Rule, they should initiate a complete public process with at least as many hearings as were conducted to formulate the rule. (Organization, Sitka, AK - #A12003.11100)

### **274. Public Concern: The Forest Service should conduct fewer, more productive public meetings.**

Working with local communities, organized groups, states, tribes and individuals is desirable. However, our experience has been that current FS processes are too long and tedious for many citizens to endure. Organizations with paid staff for such purposes tend to be the ones that most influence the process. Fewer, more productive meetings with a wider representation of forest users are needed. (State Agency, Social Circle, GA - #A22054.14200)



**275. Public Concern: The Forest Service should improve the way forest personnel conduct public meetings.****ENSURE THAT PERSONNEL ARE WELL INFORMED REGARDING PROPOSED ACTIONS**

I was amazed when I went to the public hearings last year in Kalispell, MT and the officials could not even tell us which specific areas would be included in the 60 million acres to be put under lock and key. I've already seen too much of Montana's National Forest area gated off over the last decade. (Individual, Kalispell, MT - #A1700.14200)

**ENSURE THAT PERSONNEL USE UNBIASED LANGUAGE**

"Do you want clean water? Do you want clean air?" This is how the Forest Service started the public comment periods here. Well who doesn't want clean water and air. But they implied that if the roadless rules didn't go through as presented, that was the outcome to America. The Forest Service personnel were so biased and arrogant it surprised me. But then they must have figured the administration had this one in the bag. The presenters even implied that more area could be included than was proposed. It seemed the Forest Service at that time wasn't interested in managing the resources but would like to see the National Forests as big parks. (Individual, Port Angeles, WA - #A30310.10135)

**276. Public Concern: The Forest Service should improve citizen participation in public meetings.****ENSURE THAT LOCAL CITIZENS ARE ADEQUATELY REPRESENTED AT MEETINGS**

The forest service should make sure that all voices are listened to. Most meetings are attended by very few people. Environmental groups bus in people to overwhelm the local voices. Many local citizens don't hear about them and if they do they don't understand the impact of decisions that concern them. Make sure all meetings are well attended. If the locals are not represented, don't hold the meeting until they are! (Individual, Olympia, WA - #A444.14120)

**ELIMINATE BRIBED ATTENDANCE AT MEETINGS**

During the initial roadless meetings/hearings a number of local green groups paid college students and other young people to attend. This is not fair. In talking with some of those young people I discovered that they had never been in any of the disputed areas in our state! I believe the Forest Service can eliminate bribed attendance by asking if a participant received money to attend and to ask what areas their comments pertain to. (Individual, Palmer Lake, CO - #A23361.12230)

**ALLOW ADEQUATE SPEAKING TIME AT MEETINGS**

We had 3 minutes to speak at the initial roadless meetings—this was not enough. I would say 10 minutes minimum is needed. (Individual, Fraser, CO - #A30203.15152)

**277. Public Concern: The Forest Service should conduct meetings on the model of those held by the Sequoia and Kings Canyon National Parks**

Consider the format of the excellent public-input gathering meetings that were held not too long ago by SEKI (Sequoia and Kings Canyon NPs) on their (ongoing) WMP (wilderness management plan): these meetings were by far the best in my experience. (Unless I felt assured of similar arrangements, I would be reluctant to make much effort to attend a meeting where my questions or input might be curtailed).

SEKI mailed out information about the purpose and nature of these meetings in advance. They opened with a brief slide show and presentation. They took audience questions without limitation, and because of their good prior presentations, and because questions could be asked of agency personnel during the remainder of the meeting, this public question period "self-limited" in a reasonable period of time.

Then public input was gathered as follows: some bulletin boards had been set up around the hall, each labeled with a generalized "issues category" such as, "Trails, Signs and Bridges", "Fires", "Desired Wilderness Conditions", "Solitude v. Free Access", "Permits and Reservations", "Bears and Food Storage", "Group Size", "Camping/Campsites", "Wastes/Sanitation", "Administrative Methods/Minimum Tool Concept", "Meadow and Streambank Management and Stock Use",

“Commercial Users/Permitting”, etc., an “Other Issues” board might have been useful as well. Paper and pencils were provided and all were invited to write down their suggestions and comments on any topics they wished, and pin these up under appropriate category headings (signed or unsigned).

Everyone could read all posted comments and make additional comments/proposals/counter proposals.

This continued until everyone felt satisfied, people being free to leave at any point, since the only remaining agency action was to take down all the comments and file them for subsequent processing.

This method admirably avoided heated argumentation and aggressive people monopolizing the debate. No one ended up having to leave with the feeling they had not been given a fair chance to participate as fully as they wished. Nor did the meeting last inordinately long, public participation had voluntarily concluded within four hours of the meeting’s scheduled start. (Individual, Bishop, CA - #A20954.14200)

## **278. Public Concern: The Forest Service should televise public meetings.**

Keep up the democratic process used in decision-making. Televise hearings for local and cable channels. (Individual, Woods Hole, MA - #A12805.14120)

## **279. Public Concern: The Forest Service should conduct day-long workshops.**

The best way to get input may be to have day-long workshops (Saturday) in local communities, where people can provide input on the roadless areas that they are familiar with. May be good to have a set of questions/issues/information to be addressed for each one (current use, suitable timber, wildlife habitat, wilderness attributes, unique features etc). . . Again, have whole day work sessions to individually discuss the roadless areas around the local communities. Discuss the current situation over the whole Forest (how much is open to motorized use, how much isn’t, past and current levels of timber harvest and distribution of capable/suitable acres) so that everyone gets an idea of the big picture. (Individual, Iona, ID - #A13529.14120)

## **280. Public Concern: The Forest Service should hold a national public convention.**

Hold a national public convention. (Individual, Elko, NV - #A3656.14200)

## *Adequacy of Comment Period*

## **281. Public Concern: The Forest Service should allow an adequate comment period.**

This comment period is even more bogus than the first comment period. In our area, (potentially one of the areas most affected by the roadless rule), there was virtually no notification that the comment period was even going on. Then when the Forest Service responded to our questions they sent a form so confusing that very few people would even try to respond to it. This of course leads many of us to believe this comment period is set up to achieve a forgone conclusion. (Individual, Kalispell, MT - #A19138.14100)

### **TO ENSURE A FAIR AND OPEN PROCESS**

[Question 2] Allow an adequate period of time for Americans to submit official comments on the roadless area plan. (Individual, Arvada, CO - #A17160.14300)

## **282. Public Concern: The Forest Service should extend the comment period.**

### **TO 90 DAYS**

We advocate that any revisiting of the roadless area conservation rule allow for a 90-day comment period to assure adequate time for the Forest Service to develop needed information, schedule meetings, and give all interested members of the public sufficient time to comment. (Civic Group, Roanoke, VA - #A1713.45100)

**TO 120 DAYS**

Due to the lack of proper awareness of what questions are to be commented on, as the Chairman of the Montgomery County Advisory Committee with the approval of the committee, I am asking for an extension of 60 days. This is to get the information where it is understandable to the citizens of Montgomery County where they can comment. (Association, Sims, AR - #A3086.14310)

**TO 180 DAYS**

The comment period of 60 days is totally inadequate and unfair to the American public. This is a vital issue and the complex nature of this issue is reflected in the "Ten Questions to Help Guide the Decision Process." As an educated and involved American, I feel that I need additional time to formulate appropriate comments.

It is evident that the short comment period is designed to minimize the input of ordinary citizens and favor of the influence of developers, miners, loggers who have preformulated agendas. I heard about this issue today for the first time and the deadline for comments is less than two weeks away. . . . It was reported in the media that the Clinton administration held a comment period of 200 days with public meetings. The Bush administration is giving only 60 days to comment without public meetings. The Bush administration seems to think that public comment on this issue is unimportant or the public is unaware and/or uninterested, and that the short term financial objectives of a few privileged individuals is more important.

I hereby protest this attempt by the Bush administration to silence the voice of actively involved common American citizens in the management of public lands and public resources.

Please extend the comment period to at least 180 days so that I may formulate an informed comment. (Individual, Tampa, FL - #A16478.14310)

**TO 240 DAYS**

Extend comment period by 180 days. Because of the significant size and far reaching implications of this proposal the comment period should be extended to allow for better public education and participation in the process. (Professional Society, No Address - #A27584.14310)

**283. Public Concern: The Forest Service should recognize that extending the comment period would work against the Roadless Area Conservation Rule.**

Perhaps I'm cynical, but I also think that extending the comment period and seeking out people who are critical of any non-extractive use of the NFs is a way of killing the roadless proposal entirely. (Individual, Merrill, WI - #A9014.14320)

**284. Public Concern: The Forest Service should recognize that the comment period for the Roadless Area Conservation Rule was too short.**

The Forest Service recognizes that one of the major concerns with the rule is that the agency did not provide the public adequate time to comment on the proposed action. 66 *Fed. Reg.* 3244, 3248, The Forest Service's response however, is that the comment period was sufficient because it received approximately 1.6 million comments. *Id.* This argument is misleading and deceptive. When important policies are being considered, concerned parties will submit comments no matter how much time is allowed. The fact that over 1 million of these responses were "postcards or other form letters" is likely a product of the unreasonably short comment period, not an indication that the time allowed was adequate. *Id.* Responding to a proposed action by postcard or form letter does not require extensive analysis of the proposed rule and the Draft EIS. A policy that will substantially affect 43 million acres of forestland by effectively halting all major economic activity within those areas requires a substantial period of time for the public to thoroughly analyze and provide meaningful comments. It took the Federal government over a decade to study and analyze the inventoried roadless areas covered by this rule, yet it provided the public a mere 60 days to comment on the proposal. Providing ample opportunity for public comment would not have added such a substantial amount of time to the process as to have any noticeable delay in producing a rule. (Business or Association, Washington, DC - #A28689.10132)

**285. Public Concern: The Forest Service should recognize that an additional comment period would be insufficient to address the deficiencies in the Roadless Area Conservation Rule Final EIS.**

The Idaho litigation specifically took the national roadless regulation process to task for the failure to do a site-specific inventory, to provide accurate maps, or to provide sufficient information and time for the affected interests and state and local governmental entities to comment. *See Kootenai Tribe of Idaho v. Glickman*, No. 01-10, Complaint [sections] 71-72; *Kemphorne v. U.S. Forest Service*, Complaint [sections] 63-66. It is inaccurate to suggest that additional notice and comment will address the legal deficiencies of the FEIS. (Elected Official, McKenzie County, ND - #A27737.10135)

**286. Public Concern: The Forest Service should notify previous respondents to the Roadless Area Conservation Rule of the comment period for the Advance Notice of Proposed Rulemaking.**

We are concerned that the 1.6 million citizens and owners of our National Forests who commented on the RPR have not been contacted about this 60 day comment period. We were not contacted and found out fortuitously because someone sent us a fax about the proposal. (Organization, Bellaire, TX - #A883.14100)

I sincerely hope that the Forest Service remembers to notify all those who previously commented on the so-called Roadless Initiative for our country's national forests.

In the interest of fairness, all those who took the time to comment on this subject should be given the opportunity to make comments on this new and extended effort. There are many of us who are interested in this subject and do not wish to be disenfranchised on the matter. (Individual, No Address - #A1708.14120)

### *Adequacy of Timeframe*

**287. Public Concern: The Forest Service should recognize that the time frame for comment on the Roadless Area Conservation Rule was adequate.**

There was PLENTY of time for public comment during the original planning phase. The George W. Bush administration is WRONG to allow more time to pass and more roads to be built in the meantime. I am very upset that more roads could be built and more forest could be destroyed during this summer while this roadless plan is further debated in congress. I urge you to endorse the Clinton Roadless Area plan!! (Individual, Edmonds, WA - #A495.10154)

This process of asking for public input has been done, a process that took three years (not 60 days) that included all perspectives. The answer from the American people is overwhelmingly to protect our wilderness areas for our future generations and for the good of the earth. (Individual, Walnut Creek, CA - #A579.10154)

It appears that the Forest Service (FS) is attempting to undermine and disenfranchise the comments that have already been submitted. Approximately 600 meetings were held and at least two years of effort went into the RPR. About 95% of the total 1.6 million comments were in favor of protection of more Roadless Areas.

In Texas of the 29,111 Texans who submitted comments 28,718 supported more Roadless Protection while 393 were opposed to Roadless Area Protection. This means that 98.65% of Texans who participated in the RPR supported Roadless Protection while 1.35% were opposed. That is a 73 to 1 margin of support for Roadless Protection. At the two public meetings held in Texas public comments were in favor of Roadless Protection by 2 to 1.

We attended both public meetings that took public comments as well as two public meetings which were informational in nature. Where were the local people that you have said should have more say on this

issue? There were news stories in the papers about the RPR and the public meeting. We believe the local people who really cared were at the meetings and the local people who really cared sent in comments. Any suggestions that there was not enough opportunity for public comment is simply untrue. We believe you are aware of this situation and that you should speak out and tell the truth. (Organization, Bellaire, TX - #A883.10152)

**288. Public Concern: The Forest Service should recognize that the time frame for developing the Roadless Area Conservation Rule was not adequate.**

In the flawed and hurried process used to ramrod the Roadless Initiative through, a major mistake made was the inclusion of nearly three million acres of roaded areas in the policy. This is an indicator of a process so rushed attention to detail got lost in the rubble. It is the same reason that citizens who did attend the public hearings—sometimes with very little notice—did not have their questions answered by Forest Service personnel conducting the meetings. Issues as simple as asking to see maps to determine the actual area covered could not be answered by those in charge. The Forest Service personnel were not trying to be uncooperative. They simply did [not] have in many cases even the most rudimentary information to present to the public. This, in my judgment, cannot be disguised as “public participation.” (Business or Association, Helena, MT - #A17074.14100)

**AS EVIDENCED BY POOR DATA AND NUMEROUS MISTAKES**

[From Attachment 2] Records reveal that poor data and erroneous documents were being developed and used, and mistakes being made as a result of efforts to move the process too quickly in an attempt to finalize the rule-making by the end of the year. A number of letters from Forest and Regional Officers in response to data requests from the Washington Office express concern over the accuracy of their numbers: “numbers less than precise,” “This is an estimate that I hope we are not held accountable for,” “Data derived from forest plans and based on questionable assumptions,” “Some of our management prescriptions do not easily fit in the categories provided.”

A revealing Forest Service letter to the Office for the Federal Register says, “In our haste to get the notice to the Register as quickly as possible, we failed to notice that the document heading was missing.” In a telling internal Forest Service e-mail, dated 6-9-99 from Deputy Chief Jim Furnish to the Chief’s top assistant, Chris Wood, the desire to move quickly is again emphasized, stating: “If we wait until the planning rules are in place and plan revision occur, it will be too late and the quality of the product will be quite varied. If we’re going to look at roadless separate and apart from the roads policy issue, then we should put together a team and address it head on, not indirectly through forest planning. That’s my advice!” (Individual, East Helena, MT - #A20422.10135)

***Use of Science/Best Information Available***

**289. Public Concern: The Forest Service should make decisions based on science.**

Science should guide us all in our decisions but it is up to us to teach the American public how forest ecology operates and then let them make the decisions. Hopefully we will come to a point where the majority of Americans will understand the science and make the right choice for the good of all. Today and in the past, too often economics have dominated our decision making process and we are now at the point where old outdated modes of management are at an end or we will lose parts of our heritage forever.

The Agency should not be the voice of corporations or economics—they should be the source of good, reliable, peer reviewed, and repeatable science. The agency should be where we can turn for unbiased, sound information about the American Public’s Forests. We should be able to trust the agency to tell us the whole truth and let us tell the agency what we then want for our future. The state foresters and Tribal foresters can be part of the science gathering process. (Individual, Cascade, ID - #A4.14500)

Decisions should be made based on sound scientific principles and studies as performed by independent and unbiased groups. (Individual, Saint Louis, MO - #A629.14500)

National Forest lands were designed to be utilized intelligently in ways that will benefit humans, wildlife, and preserve our precious natural resources. Those who counsel complete isolation of these areas in a misguided effort to preserve them in a static, and in their view, pristine condition fail to see their efforts are in vain. Change is inevitable; therefore managed change, based on sound science, is the only logical policy. (Individual, Olivia, TX - #A4334.14500)

#### **RATHER THAN POLITICS**

We feel the FS is basing their decision more on perceived popularity than sound science. The FS needs to allow good science and the multiple-use mandate to significantly affect the roadless area planning process as well as public opinion. (State Agency, Social Circle, GA - #A22054.14500)

#### **RATHER THAN A VOTE**

Forest policy decisions are not about voting. They are about making the right decision for the land in question. The Forest Service as an agency will have to return to its roots and reaffirm itself as a professional management agency, making decisions based upon the best available science and professional judgment. (Business or Association, Coeur d'Alene, ID - #A22058.15169)

#### **BY CONSIDERING THE BENEFITS AND COSTS OF EACH ACTION**

Proposals for the creation of roadless areas or the removal of existing roads must be reviewed in a scientific and economic fashion which considers all benefits and costs associated with each action. This level of review cannot be accomplished through an agency program or Executive Order. (Business or Association, Boise, ID - #A20607.14500)

#### **BY MAKING BETTER USE OF EXISTING INFORMATION**

Better use of existing information is needed. Some present day issues were resolved during unit planning or by research, but people act like they are new. Some people argue that more research is needed, but they ignore existing research because they either don't like the answers or they have not done their homework. (Individual, No Address - #A17292.14100)

#### **BY ACQUIRING SUFFICIENT DATA TO UNDERSTAND THE ISSUES**

In order to have informed decisionmaking, the USDA should have sufficient data to understand the nature of the issues. The western national forests have gone through the management plan process and in some cases have gone through the process more than once. The Gunnison National Forest is currently approaching the revisions to its management plan by beginning to collect data from the public. It would seem that the process for creating the management plans is certainly an excellent model for the Forest Service to follow as a means of working together with communities, states, tribes and other organizations. (Business or Association, Denver, CO - #A29223.15161)

#### **BY VERIFYING THE CONTENT AND VALIDITY OF DATA**

All economic, social and environmental data must be carefully reviewed and verified for content and correctness. Qualified scientific third party data should be used whenever possible in making these important considerations. (Business, Haslett, MI - #A4861.14500)

#### **TO AVOID A ONE-SIZE-FITS-ALL CONCLUSION**

Where is the science? Again and again, in instance after instance, KARE notes that the claims, assumptions and positions taken in this Roadless proposal are not backed up by accurate scientific evidence. WE cannot treat animals, plants, or any aspect of Nature as if they will all respond alike to certain circumstances. The one-size-fits-all look at this situation, the conclusion that all roads are harmful to all species, is an opinion, and the reason there is no scientific evidence to support the conclusion, is that it is unprovable. This lack of scientific backing is a fatal flaw in this Plan, and all the other Forest Service proposals put forth recently. (Organization, Yreka, CA - #A8381.14500)

#### **TO AVOID BIAS IN DECISIONMAKING**

If "roadless" area conservation is to be properly forwarded then I urge the USFS to complete an unbiased study. This has not occurred to date. Get a respected and neutral team of experts, such as the National Academy of Sciences, to complete a science-based study with subsequent recommendations.

Have local and regional community leaders and activists and individuals a part of that process, so that local concerns are addressed and national, impacting a very significant amount of acreage. (Individual, Reno, NV - #A20857.14000)

#### **TO BALANCE ECOSYSTEM STABILITY AND ECONOMIC ACTIVITY**

America faces a quiet crisis of unparalleled proportion, that of the long-term maintenance of its biological heritage. This crisis has arisen because of our failure, both locally and nationally, to manage successfully for economic activity and environmental protection at the same time. If we are to create conservation strategies that truly benefit imperiled species and ecosystems while promoting responsible economic activity, science must become the fundamental foundation for decisionmaking. Scientific consensus on issues of critical national interest should not be treated as a special interest to be negotiated or compromised. (Organization, Washington, DC - #A27037.14500)

### **290. Public Concern: The Forest Service should avoid relying on weak scientific analysis.**

I am most concerned about what I perceive as a recent trend of the Forest Service to rely on weak, incomplete and invalid scientific analysis to support a predetermined policy objective rather than the stated policy of making a complete and objective analysis of the situation and then basing the policy decision on the objective facts. In some cases this includes ignoring published scientific work that is contrary or inconsistent with the desired outcome. Reliance on invalid scientific analysis not only results in bad public policy, it sets a precedent for the use of bad and invalid science that others may exploit in the future and it creates public mistrust in the objectivity of science. In order to avoid this scientifically untenable situation, I recommend the following:

- 1) The Forest Service should rely only on valid scientific analysis using quantitative methods, experimental methods of assessing the impact of roads and the use of control data to determine the statistical significance of the data.
- 2) The Forest Service should use only data obtained by objective sources and exclude studies from groups that have conflicts of interest.
- 3) Each proposed closure must be analyzed on a case-by-case basis because the scientific facts pertaining to the situation will also vary uniquely. The current proposal uses many "one-size-fits-all" responses to perceived problems.
- 4) The results of the study should be interpreted in terms of the impact on the entire ecosystem or range of affected species. Just because you can identify a local effect does not mean that the overall effect will be statistically significant.
- 5) The ability to mitigate any local effects without resorting to closure must also be considered.
- 6) Any proposed changes should have the minimum impact on other mandated uses of the National Forest, including recreation. (Individual, No Address - #A27083.14500)

### **291. Public Concern: The Forest Service should recognize that the best available science regarding individual areas is maintained at the local level.**

Any future rule-making should recognize that the best information regarding individual roadless areas is often maintained at the local level. The previous rule-making was flawed by the need for nationwide consistency in the data employed in the NEPA process. In many instances, this led to use of data that was either outdated, or of such a coarse scale that it masked local and regional impacts that may have otherwise proved unacceptable if exposed to the light of day.

For example, the RACR was constructed using a coarse scale fire regime and condition class assessment that was useful only as an approximation for national strategic planning purposes. This assessment showed that 767,000 acres of roadless areas within Idaho were at medium to high risk of catastrophic fires that would damage ecosystem health. A more refined assessment done by regional personnel, however, suggested that the actual number of acres in Idaho at medium to high risk of catastrophic wildfire was actually greater than 2.5 million acres.

Despite having access to the refined Idaho data the EIS team chose to omit it, since similar data was not available nationwide. In the team's mind, the need for compatibility across data sets outweighed the need to use the best available data. Any future rule-making should recognize, and rely upon, local fine-scale data in determining the proper management regime for each roadless area. (Governor, State of Idaho - #A20141.14500)

**292. Public Concern: The Forest Service should recognize that science does not change with geographic location or political affiliation.**

*They also maintain that environmental analysis and resource management decisions effecting individual national forest should be based on local information and knowledge and the best available science rather than applying one standard uniformly to every inventoried roadless area, no matter the location.*

Local information and knowledge has been supplied in the previous efforts by citizens in over 600 public meetings, by citizens in over 1.5 million written comments, and presumably by Forest Service professionals working within each of the National Forests affected.

Science operates by . . . identifying general processes within these models, and using these processes, sometimes inaccurately as "laws", to make predictions about the systems that are being modeled. The way science is done does not change with respect to geographic location or political affiliation. Unfortunately what is passed off as "science" is often highly biased and misleading. The "Information and science" sentence above implies that the results of science would differ from place to place. If that is the case, then the Forest Service is not dealing with true science. For example, the speed of light in a vacuum is a constant—whether you are a conservative Republican multimillionaire in Texas or an environmentally-aware progressive in Massachusetts who is broke but hopes to make a change on the world that the Lorax would welcome (If you are not familiar with Dr. Seuss' story The Lorax, then go read it now—you should have read it a long time ago).

True science can provide general principles that are designed from the outset to be applied in every system that reasonably approximates the modeled system. I have not reviewed the work done in this matter, so can not comment on its quality. But the language of the sentence means that true science should not be used even if available. That meaning, if inadvertent, is an unfortunate reflection of the state of ignorance regarding science or, if intentional, is deceptive, inaccurate, and underhanded. (Individual, Nederland, CO - #A19016.14500)

**293. Public Concern: The Forest Service should avoid multiple studies on the same research topic or proposed management action.**

**TO ELIMINATE LONG DELAYS**

The decision process should be timely and eliminate the long delays brought about by layer after layer of legal traversing.

Multiple studies on the same research topic or proposed management action must be eliminated. The USFS must become more time constrained, more oriented to actual on-the-ground results. (Business, Libby, MT - #A20686.14400)

**294. Public Concern: The Forest Service should heed the counsel of scientific committees.**

**REVIEW INFORMATION FROM THE UNION OF SCIENTISTS**

Please review information provided by the Union of Concerned Scientists, before accepting so-called science from corporations.

Corporations will say or do almost anything to make a buck. (Individual, Miamisburg, OH - #A208.14500)



**FOLLOW THE RECOMMENDATIONS OF THE COMMITTEE OF SCIENTISTS REGARDING THE PLANNING PROCESS**

The proposed roads prohibition rule is contrary to the recommendations of the Committee of Scientists (COS) in their 1999 Report of the Committee of Scientists. The COS recommendations necessitate an open democratic planning process that includes a broad range of values, uses, products, and services with a high degree of public participation from all stakeholders. The COS recommends that the Regional Forester remain the highest level of decision making with planning efforts oriented strongly to local areas and local issues. In that way, the planning process can mold the plan to the needs and issues of local communities adjacent to or within roadless designations and lists criteria by which roadless designations are precluded if those criteria are met by particular affected communities. How can the Forest Service justify complete rejection of this most recent analysis by such a highly qualified team? (Professional Society, Anchorage, AK - #A21707.13110)

**CONSULT WITH THE UNION OF CONCERNED SCIENTISTS REGARDING THE NEED TO PRESERVE BIODIVERSITY**

Everyone had ample opportunity to comment on the plan, (Unlike your current fast track approach). And now you guys are just going to undue all that work? You're going to just blow the fair, democratic process out of the water and substitute your own foolish, status quo plan? Thanks for spitting in the face of democracy once again. You people disgust me.

The best way to maintain healthy roadless areas is to keep them roadless. Duh! Don't you understand it's time to stop destroying nature and preserve the little of it that is still intact? It is extremely important to all of us, even people like President Bush who just doesn't 'get it'. Bush is wrong, environmentalists are right. One of the greatest mass extinctions in human history is taking place right now. The majority of scientists are in agreement that it is important to save what is left of biodiversity and attempt to improve habitat that has been destroyed or degraded. If you don't believe me, contact the Union of Concerned Scientists. (Individual, Palouse, WA - #A6756.12200)

**295. Public Concern: The Forest Service should provide access to science and research regarding roadless areas.**

The public should have access to the science behind some decisions to allow for open review of the validity of the research and for public education. (Individual, Brimley, MI - #A3659.14100)

**296. Public Concern: The Forest Service should not accept as scientific facts the anecdotes or opinions submitted by the public.**

Throughout the process, user-reported information related to facts that require scientific analysis should be ignored entirely. That is, where concerned individuals or organizations purport to provide scientific "fact" in the form of anecdote or opinion, this information should be disregarded by the forest service, which has its own scientific methods and personnel. (Organization, Denver, CO - #A29624.15110)

**297. Public Concern: The Forest Service should consider "The Roadless Area Initiative: Politics Makes Poor Policy."****BECAUSE IT IS WELL GROUNDED IN FACTS, SCIENCE, AND BREADTH**

I urge the team to give great weight to the input statement by the Forest Service Council, National Federation of Federal Employees under the title "The Roadless Area Initiative: Politics Makes Poor Policy". It seems well grounded in facts and science and breadth, in contrast to statements of advocates from both sides of this controversy.

In sum, I feel the current proposal is too broad in its current form, and urge that it not be adopted. Instead, modify the proposal or continue programs mentioned above. (Individual, Asheville, NC - #A6248.10130)

**298. Public Concern: The Forest Service should scrutinize scientific studies submitted by representatives.**

**TO VALIDATE THE INFORMATION**

If representatives are planning to put forth “scientific studies” to substantiate their views, these studies need to be scrutinized by objective peer review, otherwise they should be considered suspect. (Individual, Holtville, CA - #A8729.14500)

**299. Public Concern: The Forest Service should develop a sense of perspective when evaluating environmental impacts.**

**TO AVOID ARBITRARY AND CAPRICIOUS REASONING BASED ON BIASED SCIENCE**

The lack of defensible and logical reasoning is an indicator of bias. The environmental document evaluations and decision-making must work hard to avoid arbitrary and capricious reasoning based on science with a bias. The Interdisciplinary Team must develop and use an overall sense of magnitude when evaluating positive benefits to the natural environment versus negative impacts to the human environment.

For example, the lack of adequate policy and implementation of fire management practices has lead to many catastrophic fires. The sedimentation resulting from these fires is many times that of all OHV activity in the forest. The natural rate of sedimentation is many times that of all OHV activity in the forest. These are examples of the sense of magnitude that must be exercised when evaluating impacts in the document and decision-making. (Organization, Helena, MT - #A13226.14500)

*Adequacy of Public Comment*

**300. Public Concern: The Forest Service should recognize that there was adequate opportunity for public comment on the Roadless Area Conservation Rule.**

More than 600 public hearings were held nationwide on the Roadless Rule, making it the most extensive public involvement process in federal rulemaking history. More than 1.6 million Americans submitted official comments, 95% of which supported strongest possible protections for remaining roadless areas. Ample opportunity was given to tribes, states, communities, and the public to comment on the Rule. Many views and suggestions presented during the public comment period were included in the final rule. (Individual, Edwards, CA - #A4547.10150)

While I only attended the hearings in Eugene, Oregon, it appeared to me that the original process was fair and open. I attended an informational hearing in December of 1999 and gave testimony at a public hearing in June of 2000. The meetings were well publicized and held at a convenient time. I am attaching a copy of my testimony. I find it difficult to believe that the process was not fair and open. Some people who didn't get what they wanted are asking for another [turn] at bat. (Individual, Deadwood, OR - #A881.10152)

The hearing I attended in June 2000 was one of a series of well-publicized hearings where the public (I) was heartily invited to participate. The outreach was so well done that I felt informed about every step of the process. No other USFS request of public input has reached me as did the roadless comment period. I applaud the outreach efforts of the USFS and the work involved in hosting 600 public hearings. My experience of the process makes the allegation that there was inadequate opportunity for public review and comment on the roadless rule (Federal Register Advance Notice web page 2) laughable. It was the most public invitation to comment that I have experienced in my lifetime.

I am both saddened and insulted that after this highly visible comment I have to again express my views on a rule that should have taken effect on March 12, 2001. The public participated in the process in incredible numbers as evidenced by the receipt of 1.6 million comments. It is as if the 95% of the 1.6

million comments gathered in support of the January 12 policy are not to your liking and should be disregarded in this new review process that is far less public than the initial process. (Individual, Portland, OR - #A3713.10152)

The 1.6 million public comments already collected in support of strong protection for roadless areas is evidence that the public has already been given ample opportunity for the forest service to hear their concerns. The abundance of public meetings and other opportunities to become informed of the proposal already appears to have secured a fair and open process. If the forest service delays and modifies the roadless area conservation rule, which was widely supported by the American public, the forest service is in danger of imparting the sense that the process has been neither fair nor open. (Organization, Missoula, MT - #A613.10152)

After a record of 600 public hearings and an unprecedented 1.6 million comments, in which 90 percent of the people said they wanted to preserve the national forest's roadless areas, you want to know what people think about preserving roadless areas. Huh? (Individual, Tampa, FL - #A4555.10152)

With 1.6 million public comments and 600 public meetings, the roadless program had more public participation than any other rulemaking in the US federal government's entire history.

The assertion that "there was inadequate opportunity for public review and comment on the roadless rule" is grotesquely preposterous and betrays phenomenally profound ignorance of the subject.

The only way anyone could say such a thing is if they are so staggeringly clueless that they are utterly incompetent to deal with this issue, or if they have so prostituted themselves to exploiting industries that they are disqualified for gross conflict of interest.

Don't you realize this damages your organization's credibility and reputation? (Individual, Oakland, CA - #A28134.10152)

**301. Public Concern: The Forest Service should recognize that the volume of comment received on the Roadless Area Conservation Rule was more than adequate.**

Do not in any way weaken this rule. 1.6 million people commented in the first (and we thought final!) round, and 600 public meetings were held — I simply can't believe the Bush administration is declaring that there was insufficient public comment. (Individual, Seattle, WA - #A84.10153)

I'd like to go on the record as being in 100 percent support of the Clinton Administration's decision to keep much of the national forests roadless, and I can't understand why this is being revisited after enormous amounts of public input last time around. (Individual, Bethlehem, PA - #A2.10153)

Please defend the Forest Service's Roadless Area Conservation Rule in its present form. As you know, this rule came about in response to the largest outpouring of public support for a conservation measure in the nation's history. (Individual, Bloomington, IN - #A127.10153)

**302. Public Concern: The Forest Service should recognize that there has been sufficient local input.**

In fact, local voices have spoken - and continue to demand that the Forest Service reevaluate its stewardship of forests that are increasingly valued for recreation rather than just logging. Protecting roadless areas on the East Coast is particularly important because its natural forests are smaller, more heavily timbered and closer to urban centers. (Individual, Charlotte, NC - #A592.10150)

I have lived in the Tongass National Forest for more than 30 years. Hunting and fishing in the Tongass provide the staple foods in my home, and I use the National Forest for many kinds of recreation. I

believe that I represent what is meant by a local community resident who is strongly concerned about the Tongass National Forest, and especially about the roadless areas.

I commented on the original roadless plan, and like the overwhelming majority of the million and a half respondents, I strongly supported that plan. My most important comment is that I would like to see the roadless area policy implemented as it was written into the Federal Register on January 12, 2001.

Instead of reopening this process to address the concerns of the extremely small minority who did not support that plan, I would urge the Forest Service to implement that original policy. (Individual, Sitka, AK - #A698.10150)

I live in Pocahontas County, WV, which is more than 50% National Forest. There is a significant timber industry here with several local mills. The Roadless Initiative received more publicity than any FS project in our area since the creation of the Cranberry Wilderness. Besides the legal advertisements, there were prominent stories in the local paper and interviews with the Forest Service on our local community radio station discussing the impacts, such as the number of acres involved, the number of jobs affected, etc. This local coverage occurred over several months, before both the public meetings the Forest Service held to explain the Roadless Initiative and the formal public hearings held (ours was at Seneca Rocks here in WV) to receive comments. So many people showed up to make comments that they couldn't fit in the room. Of the dozens of people who spoke, only a handful opposed the Roadless Initiative.

So what difference is more local input going to make? How more local can you get? Or is more local input a euphemism for selective input from the timber industry, i.e. those who made sizeable contributions to the Bush campaign? (Individual, Hillsboro, WV - #A4600.10152)

### **303. Public Concern: The Forest Service should explain its assertion that there was inadequate local input on the Roadless Area Conservation Rule.**

The Forest Service should provide empirical evidence to support its assertion that there was not enough "local input" in the previous Roadless Rule public involvement process.

Which brings us to an ancillary point. Who ultimately decided that there wasn't enough "local" input in the last go round? Did someone analyze the 1.6 million comments and determine that "local" input was lacking? I doubt it. I want to know what empirical data was used to determine that this current comment period was necessary. This is a serious request for information. I am a "local person," living in a "local" community, surrounded by national forests. It would appear my opinion is the one you are seeking out. So please inform me as to why my last letter was insufficient. (Individual, Lewiston, ID - #A29569.13110)

### **304. Public Concern: The Forest Service should consider that the only groups objecting to the adequacy of the public comment process for the Roadless Area Conservation Rule are those that don't want it.**

The roadless rule's promulgation clearly satisfied any rational test for sufficient opportunity for public involvement. The roadless rule garnered more comment than any other Forest Service decision in history. The combination of over 600 local public meetings combined with national media exposure ensured that anyone with an interest in roadless area protection would have an opportunity to learn about the Forest Service's proposal and comment upon it. That over one million people chose to do so is testimony to the outreach effort.

The interest groups who now object to the adequacy of the public comment process share one thing in common - they don't like the outcome so they are crying foul about the process. However, if the situation were reversed (as it soon may be!), those same interests won't be heard objecting to the inadequacy of a much less involved public process so long as they get the results they want. (Union, Eugene, OR - #A6245.10152)

The interest groups who now object to the adequacy of the public comment process share one thing in common - they don't like the outcome so they are crying foul about the process. (Individual, Corvallis, OR - #A8027.15120)

**305. Public Concern: The Forest Service should recognize that there is inadequate opportunity to comment on the Advance Notice of Proposed Rulemaking.**

I think it is very interesting that this is being opened to public comment again, because the Administration . . . feels not enough people had an opportunity to comment the first time. Yet, the reality is that this 60-day comment period is not only during the warmest of the summer vacation days, but has no real public involvement component. The local Olympic National Forest has no public meetings planned, nor have mailings been sent to those who commented the first time. Given that members of the public would have to actively search for a way to make comment, one questions the motivation.

I urge the Administration to move ahead with the Roadless Area proposal, which has already gone through the public involvement process, ad nauseam. (Individual, Olympia, WA - #A4503.10152)

*Analysis of Public Comment*

**306. Public Concern: The Content Analysis Team should adequately analyze and report public comments.**

**SO THAT THE ACTUAL DESIRES OF RESPONDENTS CAN BE DETERMINED**

I was also extremely disappointed in the review process and found that the manner in which the comments were analyzed and reported made it extremely difficult to determine the actual desires of the commenters. The Comment Analysis Team simply categorized the comments and then chose polarized "representative" comments in each category. I have participated in BLM planning process and was much better able to determine the direction the comments were coming from in the reports their Comment Analysis team developed. Each individual commenter was listed along with a listing of which categories his or her comments belonged in. (Organization, Huntsville, AL - #A13542.15150)

**307. Public Concern: The Forest Service should quantitatively analyze public comment.**

. . . throughout this process and all others, use of quantitative language whenever possible would lead to a more open and sincere dialogue. As I understand it, the law requires comments to be entered into an official record. If that is correct, then the Forest Service can determine the number who assert as claimed and the percentage of the total commentors who assert as claimed. Citing those numbers would be clearer . . . (Individual, Nederland, CO - #A19016.11110)

**ACCURATELY TABULATE COMMENTS**

I believe this plan was rushed through without adequate comment from the public that uses the forests. I further believe the comments received by the Forest Service have not been accurately tabulated. For example the Forest Service apparently told "Heritage Forests Campaign" that I support the plan—I'm now on their mailing list as an ally. (Individual, Shingle Springs, CA - #A971.15151)

**QUANTIFY HOW PUBLIC OPINION HAS CHANGED SINCE EARLIER PLANNING PROCESSES IN WHICH ROADLESS AREAS WERE ADDRESSED**

If the basis for the proposed rules is in response to public opinion, the environmental documents should quantify how this public opinion has changed since these issues were addressed in the earlier, RARE, ReRARE, RARE II, Oregon Wilderness Act, Northwest Forest Plan, Hells Canyon National Recreation Area Act, and the various land and resource management plans. The issue of roadless area management was extensively debated in all of these processes, and the final decisions were designed to balance the various needs for the national forests. Any alteration in this balance should be addressed in the forest

plan revision process and not on a generic one-size-fits-all strategy. (County Attorney, Grant County, OR - #A17667.14140)

**308. Public Concern: The Forest Service should create transcripts of public meetings.**

Those people who appear and make comments at meetings near a particular forest know that forest far better than the eco-fundraisers with their form letters. A transcript should be made of all local meeting comments, and the commenters given a Week or two to make corrections before the comments are published both as hardcopy and on the Internet. A transcript on a computer can be instantly searched for keywords, and will be a permanent asset for local USDA forest managers. It will also be a clear indication that USDA is actually listening, rather than merely going through the motions prescribed by the Administrative Procedures Act. (Organization, Tonopah, NV - #A20337.14200)

**309. Public Concern: The Forest Service should verify the validity of organized response letters.**

As a taxpayer and a member of the forest products community I am writing to express my concerns over the validity of the Roadless ANPR comments now being received by your CAT from the enviro-radical e-mail list members.

First of all, the content of these comments addresses the political agenda of the authors rather than the science of forest management as it relates to your 10 questions.

Second, the transmittal of the comments both to your CAT and to the internet loops of "environmentalists" harps on the value of previous comments in favor of the existing roadless plan. It conceals the facts that this plan was illegally crafted in violation of the NEPA, ignored local input at all levels, and was based on inadequate mapping and inventorying of road classes in the various National Forests themselves. In essence, the entire previous public comment period was flawed because of the basic illegality of the plan actually presented for comment.

Third, the volume of e-mail to your CAT now being produced by enviro-radical call for internet action is suspect because of the repetitive nature of point-and-click on their prepared comments. You receive identical comments from thousands, with no limitations on the same person sending the same comment many times.

When Congress mandated multiple use for our National Forests, I am sure its members did not foresee the phenomenon of science-by-popular-vote springing from the explosion of the Internet. I do hope that the USFS will adhere to the science of forestry and the interests of all taxpayers in the revision of Roadless Area Conservation. (Business or Association, Keysville, VA - #A4946.15121)

**310. Public Concern: The Forest Service should disclose the details of late submissions.**

The Federal Register and the documents purporting to support the decision to reopen the issue fail to properly inform the readers of the details of the late submissions. The USDA must specifically advise the public of the following:

The identity of the parties making these late comments, and who they represented;

The specific content of the submissions, including their date and method of submission;

Whether the comments have become part of the official record;

Whether they were in writing or were presented orally during conversations with decision makers or someone with access to decision makers;

Whether such decision makers were involved in any conflict of interest, actual or implied. (Individual, Chico, CA - #A17483.14120)

## *Scope of Public Comment to be Considered*

### **311. Public Concern: The Forest Service should respect the comments already received for the Roadless Area Conservation Rule.**

Apparently, the Administration feels that the comments in the form of: 1 million postcards or other form letters; 60,000 original letters; 90,000 electronic mail messages; and several thousand telefaxes—430 public meetings were held—about 230 for information sharing and written comments and about 200 for collecting oral and written comments including at least two meetings on every national forest and grassland that cumulatively drew over 23,000 people nationwide received on the proposed roadless area rule were too few. I would disagree, and think that the prior administration did everything possible to include ALL sides of this issue in the debate. Although I feel the public mandate is clear, I want to emphasize that there is still the support for the roadless ban and that those people who originally commented have not changed their minds. (Individual, Medford, MA - #A16.10150)

Environmental and natural resource issues seem to illuminate the polarized positions. However, it has been demonstrated that the RACR enjoys the overwhelming support of the American people. While there are those who disagree with the rule, the Bush administration needs to respect the expressed views of the vast majority, who have already made it clear that they want roadless areas protected. More importantly, the Rule reflects a balanced approach to managing National Forests. The majority of the National Forest land is managed for multiple-use and is already open to logging, mining and drilling. A mere 18% is designated wilderness. The Rule will protect the remaining 31% of the National Forests as a natural legacy for future generations.

The RACR should be implemented and retained as it stands. The Bush administration needs to do all that it can to ensure protection of America's roadless areas. We, as a nation, have ONE chance to protect our nations roadless forestland. (Individual, Durham, NC - #A934.10150)

I am writing to express my dismay at the Secretary of Agriculture's plans to reexamine the forest roadless area rule (Forest Service Roadless Area Conservation, USDA Forest Service, November 2000 and Record of Decision (published as part of the final rule, 36 CFR Part 294, Special Areas; Roadless Area Conservation, on January 12, 2001 and 66 FR 3244) and to protest the decision.

The previous administration published this rule in answer to the overwhelming desire of the people to protect our national forests. They followed the rules, received a huge amount of input from the people, and heard from every segment of the public before publishing the rule.

Now this administration is trying to undo all the good work and ignore the will of the people. The country needs to be able to rely on our government to follow the rules and play fair and reach supportable decisions and then have some degree of finality and stability. We can't constantly revisit every decision just because special interest groups that represent a small minority disagree with the desires of the majority. And you can't make decisions that benefit primarily large corporations. You just can't run the country this way.

Please please please, do the right thing: Implement the forest roadless area rules as soon as possible. (Individual, Elk Grove, CA - #A227.10152)

The Forest Service held more than 600 meetings in local communities across the country—including at least two on every National Forest—to inform their decision to protect roadless lands. This helped to generate a record-breaking 1.6 million public comments, an astonishing 95 percent in favor of stronger protection for roadless areas. Public comments on agency rulemakings are not vote counts, but it is significant that the Forest Service allowed public sentiment to help shape the outcome of the roadless rule. In so doing, the agency reaffirmed the value of public opinion in management of public lands.

The stated rationale for re-opening the roadless rule is to hear from more local communities and to subject the future of roadless areas to the local forest planning process. It is exceedingly unlikely that reopening the roadless rule will surface new issues. What is certain is that the 600 local public meetings

and the 1.6 million comments—from people that care deeply about public lands and presumably live in local communities—are being discounted. (Individual, Points, WV - #A21262.10152)

**BY CONSIDERING COMMENTS SUBMITTED FOR THE ROADLESS AREA CONSERVATION RULE ALONG WITH THOSE SUBMITTED FOR THE ADVANCE NOTICE OF PROPOSED RULEMAKING**

I hope that the comments you receive at this time will be considered along with the many comments you received during the development of the EIS. It would not make sense to require the many people who commented in the first round to resubmit those comments. (Individual, Grangeville, ID - #A798.10152)

My first suggestion is that the existing comments on the previous roadless area decision represent several months of hard work and thought of citizens who had more ample time to consider their positions, and should be given AT LEAST equal consideration in your decision-making process. Failure to do so, I believe, threatens to erode the public trust in the USFS. (Individual, New Haven, CT - #A706.10154)

The President himself, in another and different context, recently stated, “The American people deserve a President who will listen to people and make a serious, thoughtful judgment.” However, if that is to be true, then the Administration would make a judgment to sustain the Conservation Rule, for the American people have certainly expressed themselves in favor of it and can hardly be expected to do more. For these reasons, we strongly urge that, in order that all who have evinced a desire to comment on this issue be included, the record on this public notice incorporated by reference—and you could use summaries where practicable—all comments previously submitted on the Conservation Rule. This is needed particularly so that those who went to the trouble to comment previously will not be left out. This is a very real problem since those who are voluntarily submitting comments (as distinguished from those who do so as part of their jobs) often might find there are too many things for them to handle in their volunteer or spare time and might not comment again. Yet, they should be heard. Consequently, we strongly recommend that all the previous comments be incorporated by reference. (Organization, Birmingham, AL - #A21582.15165)

**312. Public Concern: The Forest Service should include all previous comments regarding roadless area management in the record for the Advance Notice of Proposed Rulemaking.**

We respectfully request that all previous testimony, letters and comments from the people of Montana regarding national forest roadless area management, including that provided to the U.S. Forest Service in 1998 (interim roadless rule), in 1999 (scoping hearings and public comment record) be incorporated into the current public comment record initiated by the advance notice published July 12, 2001. (Organization, Helena, MT - #A21370.14000)

**INCLUDING THE COMMENTS SUBMITTED BY THE ENVIRONMENTAL PROTECTION AGENCY ON MAY 21, 1973**

The entire comment package that was submitted by the U.S. EPA to the U.S. Forest Service on May 21, 1973 should be included as part of the record for the Roadless ANPR comments. (Organization, Coeur d’Alene, ID - #A13314.15140)

**313. Public Concern: The Forest Service should not accept mail-in public comments.**

**BECAUSE THAT ENABLES GROUPS TO HAVE UNDUE INFLUENCE**

I know that my own cynicism is showing, but I have never yet seen a “fair and open” process occur in a Forest Service hearing on anything. I don’t really believe that the Forest Service should do anything beyond hosting a meeting of select, local interested people who would work out all details and present a proposal to the local FS that must be followed for the local forest. To allow any one group or viewpoint to have “super influence” through opening it to mail-in public comments (as happened with the



environmental industry during the last Roadless Area go 'round) would make it as the last one was, another travesty. (Individual, Pendleton, OR - #A666.14200)

**314. Public Concern: The Forest Service should disregard organized response letters.**

Many of the cards and letters supporting the Initiative were sent at the behest of radical environmental groups. Many senders did not actually read the Initiative, have no comprehension of its certain and negative impacts upon forest health and rural residents, and responded only to a 'feel good' campaign. All form comments, whether by letter, post-card, or e-mail, should be disregarded. This issue is too complex and too far-reaching to be decided by someone with 5 minutes to sign his name and add a stamp or click a button. (Individual, Cedaredge, CO - #A10364.14100)

*Consideration of Public Comment*

**315. Public Concern: The Forest Service should consider all comments.**

The agency's consideration of comments was deficient in critical respects. For example, the Vail Resorts filed substantive comments in December 1999 on the scoping notice and filed additional comments in July 2000 on the proposed rules and draft environmental impact statement. (A copy of our July 2000 comments is attached. Our December 1999 comments will be resubmitted under separate cover). Our comments were the product of significant effort and addressed specific inventoried roadless areas and other issues of concern to the Vail Resorts. The Forest Service, however, ignored many of the comments we raised and made no attempt to respond to our comments concerning specific inventoried roadless areas. We do not offer these observations lightly. They are based upon careful review of the draft and final environmental impact statements, the agency's responses to comments, conversations with [the] Forest Service Roadless Project Leader . . . and a December 2000 visit by Vail Resorts representatives with . . . members of the Forest Service's comment response team in Utah. (Permit Holder, Avon, CO - #A28852.10134)

Never mind the stacked hearings in Denver, Pueblo, and later Missoula and Kalispell that I attended. All the hired guns spouted their scripted message and clapped at the proper points . . . a substantive discussion of what was in the document and the "intellectual" origins of the proposal was never possible. As for the comments I submitted—done in tandem with a retired USFS planner—they were blown off as not substantive.

Well, my time was substantive and uncompensated. I live in a community that will be substantially affected by the outcome of this process, and it is my concern for my hometown, its citizens, the local wildlife and forest, and my own damned future that motivated me to put in this effort. The fate of the forest matters a lot to me and to my neighbors . . . in light of the Moose fire and the untreated fuels and the management paralysis . . . implementing a "roadless" policy that in any way resembles the Dombeck effort would be a crime against not only humanity, but nature.

The consequences are on the ground . . . and that's where the decisions should be made. (Individual, Whitefish, MT - #A20672.10130)

**BY GIVING EQUAL CONSIDERATION TO EVERY VIEWPOINT**

There is a place within the management of the National Forest system for each and every one of us, for each and every use. There has been significant change in the management of America's National Forests, and there is sure to be more. It is only fair and just however, to expect that the process of change follows the laws and principles of the nation and [to] give equal consideration to every aspect of the effects of this change. (Business, Juneau, AK - #A30599.10000)

**TO ENSURE A FAIR AND OPEN PROCESS**

Because there are so many different levels of interested people in our forests and how they are managed this may well be one of the most difficult portions of this program to reach. Every individual of each

level thinks that his or hers is the only way and they want first attention. This can only be captured in the most part by a fair and open process.

Each and every concern must be addressed no matter how trivial it may seem. Anyone left out is cheated out of their input. All comments should be given the utmost sincere consideration. (Individual, Rock Springs, WY - #A5695.15150)

#### **WITHIN THE CONTEXT OF MAINTAINING FOREST HEALTH**

NEPA provides for all to contribute comments through an Environmental Assessment or Impact Statement, but all comments should be put into the context of the highest priority—forest health. Advertising in local and regional papers and allowing for comment through email seems to work well. (Individual, Ennis, MT - #A438.14100)

### **316. Public Concern: The Forest Service should not reject consideration of issues just because they were already addressed in the Roadless Area Conservation Rule Final EIS.**

The Forest Service has represented that the Final Plan Revision will have a public comment period of six months, from July 27, 2001 to January 27, 2001. However, the Forest Service officials have stated orally that if a public comment issue was addressed in the FEIS, it will not be considered. Read literally, this means that the public comment process on the final plan revision and FEIS will not address the issue of roads in the roadless areas, section lines, and energy interests, because those issues were raised and rejected previously. (Elected Official, McKenzie County, ND - #A27737.11000)

### **317. Public Concern: The Forest Service should give all parties' comments equal weight.**

#### **BOTH LOCAL AND NATIONAL COMMENTS**

Base decisions on sound science, not politics. Listen to all views, but give each citizen's comments equal weight regardless of where they live in relation to the forests (these are national treasures for all Americans to use, not private sanctuaries to be locked up for locals only. (Individual, Layton, UT - #A5139.15000)

The danger of local management is that the local people don't always have the interests of the majority of people at heart—they are concerned with maintaining their way of life at all costs. I truly believe that we need to use our remaining natural resources with the long term in mind. Local people cannot be left out but deserve no more of a vote than any other American who owns the national forests. It is absolutely essential that all American's votes count equally. If that rule is violated you violate the founding principle of our government. (Individual, Cascade, ID - #A4.15112)

#### **COMMENTS FROM ALL INTEREST GROUPS**

One group's or individual's interests should not be put ahead of another's just because the agency decides it is expedient or because one group or individual threatens litigation. As mentioned earlier, all decisions that impact the public should be open to public comment, and those comments should be given their full weight regardless of whether or not they agree with real or desired FS policy or opinion. And in no circumstance should any party be given the opportunity to meet with FS officials without any and all other interested parties being given the opportunity to be present. This was a major problem with the formation of the original rule, the anti-recreation groups' input was solicited and valued without benefit of potentially contrasting opinion and input of other stakeholders. The public should not find fault with a process that is done fairly and openly, but it has every right to find fault with a process that favors one party over another. (Individual, Los Alamos, NM - #A3720.15110)

We need the establishment of an overall roadless plan so that interested lay persons, like myself, can communicate our vision for these federal lands, which belong to all citizens, and not just to the logging and motorized toy industries. Unlike the paid lobbyists for these industries, citizens like myself are not

always available for endless meetings or public comment on individual forest plans or the micro managing of specific tracts of land. Always making decisions at the local forest level often leaves citizens in other areas of the country out of the process. These citizens have just as much right for their vision to be heard as the paid lobbyists and local business people who often have economic interests at stake that might be in conflict with the overall health of the land. (Individual, Missoula, MT - #A5325.14000)

#### **COMMENTS FROM ORGANIZED RESPONSE LETTERS**

I am angered by newspaper articles and remarks from senators, congressmen, and members of the Bush administration stating that the majority of support for the roadless policy comes from email based form letters and that such support for the roadless given lesser consideration. I cannot express enough how strongly I disagree with such remarks. How is this any different than writing a petition and getting a list of signatures? I take the time to read the contents of the form letters that I submit. If I do not agree with everything stated, I will not click the send button. I am sure that most everyone else who has sent an email form letter would agree. (Individual, Bozeman, MT - #A3947.15150)

### **318. Public Concern: The Forest Service should differentially weigh public comments.**

#### **BY GIVING GREATER WEIGHT TO LOCAL AND RESOURCE-DEPENDENT INTERESTS**

In evaluating comments and input for management decisions from individuals and groups with strongly competitive views, values and beliefs, the USFS should apply a weight or priority system. The most weight should be to those who derive their livelihood from the public land. The next priority should be given to LOCAL public land users; sportsmen, campers, hikers, off road vehicles, and recreation users. All general and out of the local community area comments and input should be given last weight. It is important to understand that we, the local people, live near public land because we choose to and we resent outland influences (those who have never visited the area and do not understand the local issues) dictating our lifestyle and livelihood. (Individual, Prairie City, OR - #A15474.15160)

#### **BY GIVING GREATER WEIGHT TO PROFESSIONAL FORESTERS, WILDLIFE BIOLOGISTS, AND FIRE MANAGERS**

Professional foresters from federal, state and private entities, as well as wildlife and fish biologists and wildland fire managers from those same entities must provide their experience and expertise and that should also be heavily weighed when forming any resulting policy. (Organization, Moscow, ID - #A15318.15110)

#### **BY GIVING GREATER WEIGHT TO INDIVIDUALS THAN TO BUSINESSES**

We realize that the American Forest and Paper Association has a particularly important role in the decisions being made concerning these areas. It is our firm belief that, while a corporation such as the American Forest and Paper Association does have a say in these matters, a corporation is not a constituent, therefore, should not be accorded the rights and privileges identical to those of individuals. In today's world, big businesses are often dealt with as if they were constituents, being given the same rights and privileges. Yet, big businesses are not people, and should not be treated as such. We urge you to recognize that the voice of a single person is far more important than the concerns of any corporation. Every American should be concerned with the protection of our Nation's wildlife and the preservation of our forests. Any person who shows an interest in protecting the nation's forests will hopefully be doing so with his or her own intentions in mind, however, a corporation would be more interested in achieving selfish goals. The American people have nothing to gain from the destruction of the Nation's forests, however, they have a lot to lose. Many people enjoy spending recreational time in our forests: biking, camping, fishing, hunting, and even gaining spiritual and religious experiences. If we continue to allow our forests to be destroyed, soon there will be little remaining for anybody to enjoy. On the other hand, a corporation such as the American Forest and Paper Association would be gaining, not losing, from the destruction of our forests. (Individual, No Address - #A28553.15122)

### **BY GIVING LESS WEIGHT TO ORGANIZED RESPONSE LETTERS**

The proponents are quoting the fact that you received over a million responses to your original proposal—and that “the American people have spoken”. Maybe. How many of these were real letters and how many sent in a canned response proposed by some pressure group or was a paid advertisement on my e-mail to be activated by a single click. You need to discriminate between the responses. I put little weight on all those canned messages—and I hope you do too. (Individual, No Address - #A29894.15152)

The process of determination using comments from the public as an indicator of approval/non-approval is flawed. The vast majority of the citizens of the State of Montana are opposed to the roadless area but I believe that less than 1% of those people would ever respond to your request for comment. Those in favor of the roadless area as proposed are well organized with letter and e-mail writing campaigns. I would hope that you understand that process and discount it appropriately. (Individual, Kalispell, MT - #A27110.15110)

### **BY GIVING LESS WEIGHT TO UNFOUNDED AND BIZARRE VIEWPOINTS**

I should add that most of those against the roadless policy also went on to comment about the Forest Service being an extension of a worldwide United Nations/communist conspiracy trying to take over land in the US. When you ask for fairness and collaboration do you mean that these obviously unfounded and bizarre viewpoints should honestly be working in partnership with the Forest Service to help shape public policy? (Individual, Atlanta, GA - #A26430.15110)

Hey, what was unfair about the process last year? Who (among 1.6 million respondents) did not have his or her chance to weigh in on this issue? The USFS Forest Service does not have to try to find a new and better way to elicit comment on roadless values as the best way was already used last year. I personally attended 3 public hearings in Gainesville, Ga. and Atlanta. The only unfair thing I experienced was state DNR representatives in uniform openly advocating against the roadless policy. I thought that was very unfair. I should also add that most of those against the roadless policy also went on to comment about the Forest Service being an extension of a worldwide United Nations/Communist conspiracy trying to take over the land in the US. When you ask for fairness and collaboration do you mean that these obviously unfounded and bizarre viewpoints should honestly be working in partnership with the Forest Service to help shape public policy? (Individual, Santa Rosa, CA - #A25389.10152)

### **BY GIVING LESS WEIGHT TO “NON-PARTICIPANTS”**

The National Forest Planning process for each National Forest is the most suitable method by which the USFS can employ collaborative groups made up of local citizens and organizations. Caution must be observed in recruiting, organizing and recording a collaborative group’s recommendations. The USFS must be empowered to assign consequences to “non-participation” for whatever the reason. While dissent from those not participating should be captured and recorded, without participation in the process, the dissent should carry far less weight than that of those willing to participate. Rules for voting and for “qualifying to vote” must be part of the collaborative process framework. “Participation” would imply being present for most of the interactive process from inception to a true and recognized ending. (Organization, Moscow, ID - #A15318.15162)

### **BY CONSIDERING RESPONDENTS’ QUALIFICATIONS AND IMPLICATIONS OF SUGGESTED COURSES OF ACTION**

The demands of the public that you need to weigh must be qualified both as to the level of information the respondent is forming their opinion upon, as well as that course of action’s result on the total base which you manage. Dale, fundamentally, as agency chief, you need to make some critical decisions that will be of paramount importance to the continuing health of the forest. They may not suit the loud catcalls that are trying to drown out the simple fact that the lands you are Chief over are not parks, but live, working forests that produce not only emotional but tangible commodities for the American public. Trite as it might sound, consider that every purchase of OSB, studs, dimension of plywood from the American Forest Products Industry is a vote for pro-active management of the national forests that

clearly opposes waste of potential wood products. (Business or Association, Hamilton, MT - #A25779.15160)

#### **AT PUBLIC MEETINGS**

The Forest Service should conduct public hearings that invite all interested parties, who should be asked to identify not only their opinions, but also what financial interests they have in the outcome of the proceedings. The interests of recreational and other transient users should be solicited from lists of people who register with the Forest Service, rather than relying on their serendipitous ability to attend hearings in areas far from where they live. Corporate interests should have no more weight than those of others, and the interests of people who benefit from the existence of forest sanctuaries but are not aware of either the forests or the hearings—for instance, people who benefit from the environmental processing of air and water that occurs in forests—should be given substantial consideration, perhaps through the assistance of expert testimony. (Individual, New Haven, CT - #A616.15000)

### **319. Public Concern: The Forest Service should consider special interest groups' comments with caution.**

#### **SPECIAL INTEREST GROUP LEADERS DO NOT NECESSARILY REFLECT MEMBERS' OPINIONS**

The leaders and lobbyists of national special interest groups such as the Sierra Club do not necessarily reflect the opinions of their members. In fact, it is my opinion that these people only reflect the opinions of the most extreme of their membership. (Individual, Saint Louis, MO - #A629.15121)

#### **SPECIAL INTEREST GROUPS DO NOT NECESSARILY REPRESENT THE VIEWS OF THE LOCAL COMMUNITY OR OF THE PUBLIC AT LARGE**

I noted a Letter to the Editor in the August 24, 2001 Crested Butte News by Mr. Sandy Shea of HCCA indicating among other proposals the reversion to roadlessness of Flat Top Mountain. Fortunately via the excellent websites of USDA Forest Service I was able to acquaint myself with this issue relatively quickly. It appears that HCCA has the purpose of providing the Regional Forester with a community consensus of the Roadless Conservation Rule to soon be formulated and implemented. I can state clearly that this group has had no input from me, seems to be exclusive on any outside input, and gives every indication of recommending policies compatible to that of HCCA. I have asked for minutes, meeting dates, and other information regarding this group to no avail. I am concerned that my situation will be replicated with other individuals and small groups concerned with specific issues in public land use access in Gunnison County and elsewhere. (Individual, Littleton, CO - #A13845.15120)

The public meetings have been more convenient for organized groups and paid lobbyists than for many local citizens. In Georgia, we have seen the same few individuals making the same comments at every meeting. It is no surprise that the preservation agenda is so prevalent among the citizens at these meetings. Although public meetings are an important tool in obtaining input, we feel they are biased and do not necessarily give an accurate representation of overall public desires. (State Agency, Social Circle, GA - #A22054.14200)

### **320. Public Concern: The Forest Service should identify input from those with a monetary stake in the outcome.**

In all cases, efforts should be made to identify and “flag” input coming from those with monetary stakes in the outcome of any planning process, including employees of the Forest Service as well as employees/owners of potentially-impacted timber-related businesses, etc, so as to achieve, at the very least, full and open disclosure of all factors possibly influencing the process and its results. (Individual, Bishop, CA - #A20954.15120)

**321. Public Concern: The Forest Service should recognize that those with financial interests in forest resources have an incentive to submit detailed and aggressive responses.**

Open, on the table, broad based public participation is appropriate, remembering that those with schemes for destruction of our forests for financial gain have an incentive to be much more detailed and aggressive than many of the citizens who generally [support] the roadless rule. (Individual, Pasadena, CA - #A17237.15110)

**322. Public Concern: The Forest Service should evaluate the consideration it ought to give to the majority opinion.**

**GIVE SERIOUS CONSIDERATION TO THE MAJORITY OPINION**

As noted recently by an Agriculture Department spokesman, a rulemaking is not a vote. However, in a circumstance where public opinion weighs heavily in a particular direction, that public opinion must be granted serious consideration, and the possible actions should be tempered accordingly. I look forward to seeing that consideration of the public comments received reflected in any modifications that are put forward in the course of this rulemaking. (United States Senator, Washington - #A30693.15110)

**DECIDE THE MANAGEMENT OF ROADLESS AREAS THROUGH A PUBLIC VOTE**

The Forest Service should try to put the Roadless act on a ballot in the Fall, and let the general public decide the issue once and for all. The inventoried roadless area is on our land so why not let us, as a country decide the fate of our National Forests. We decide on our presidents this way, why can't we decide the fate of our forests this way as well? (Individual, No Address - #A17702.15151)

**DO NOT ALLOW THE PUBLIC COMMENT PROCESS TO TURN INTO A VOTE**

In the previous rule making process we saw public involvement become a voting process orchestrated by the giant environmental organizations and involving masses of people with no real knowledge of the roadless areas or the real issues surrounding them. They responded to what they were told, even though much of that information was false and misleading. We would hope that this new effort would be more professional, looking at content, not numbers. (Individual, Boise, ID - #A5165.15120)

Solicitation from user groups is extremely important in the context of roadless decision-making. The agency must also ensure that accurate, up-to-date maps of inventoried roadless areas are provided in the forest planning process. As a general matter, the agency should judge the quality, not quantity, of comments submitted in the forest planning process. Too often emphasis is placed on the number of form letters or emails received by activist groups rather than the thoughtful, individual comments of stakeholders or local user groups. (Permit Holder, No Address - #A5285.15150)

If this 60 day review is reduced to a massive letter writing campaign, Alaskan's wishes and opinions cannot prevail. For more than thirty years, the lower 48 decision makers have viewed their vote on Alaska as the place to win the support of the preservationists while doing less in their own state. There is no way that a uniform roadless policy can be applied to all national forests. Please support the majority of Alaskans and not allow the decision to be made based on which side sent the most comments. (Business or Association, Juneau, AK - #A879.15111)

Don't look at numbers of comments as a deciding factor. It is the quality and substance of comments that should weigh into decisions. Many comments come from people with no knowledge of the lands or issues being addressed. They simply respond dutifully to pleas for cards and letters. At the initial rule making hearings we saw busloads of activists arriving in a party mode to present testimony from cards randomly handed to them. We see thousands of cards and letters generated by campaigns that tell them what to say. This is a game originated by environmental organizations that everyone has learned they must play. How many of the responses come from people who have actually read the documents they are

commenting on? When a few hundred documents are distributed and several thousand responses are received, the answer is pretty evident. (Individual, Montpelier, ID - #A9058.10153)

This is not a vote. Don't pretend to make it a vote. You are asking for substantive comments to help with decisionmaking. If a group sends you 10,000 cards with the same comment, it still only counts as one substantial comment. If you want a vote, get it on the ballot in every state. The only vote that counted took place in Florida last November. (Business or Association, Spokane, WA - #A21364.10133)

I read this week in the local paper that the Sierra Club and allied environmental groups "say they hope to have collected 2 million written responses" to the Forest Service's July 10, 2001, ANPR. I cannot recall a time in our history when the regulatory comment process has been so captured by such a "vote" mentality. It certainly was never the intent of the Federal Administration Procedures Act. I wish for the day when we can turn management of our national forests back to the Forest Service professionals. (Individual, Spokane, WA - #A17819.10133)

**RECOGNIZE THAT MAKING DECISIONS BASED ON MAJORITY PREFERENCE IS A VIOLATION OF THE AGENCY'S CONGRESSIONALLY MANDATED DUTY**

The mandate of the Forest Service, as an agency of the Executive Department of the United States government, is not determined by meeting the desires of concerned individuals or organizations, it is determined solely by congressional directive. The Forest Service is bound to meet congressional mandate as set forth in federal statute, including NFMA (16 U.S.C. [sec] 1600, et seq.), the National Environmental Policy Act (NEPA) (42 U.S.C. [sec] 4321, et seq.) and FLPMA (43 U.S.C. [sec] 1701, et seq.). The Forest Service may not consider the desires of individuals and groups as to a particular outcome of the forest planning process as "votes" and thereafter make its decision on a majority-rule basis. Such is a derogation of the Forest Service's congressionally mandated duty. (Organization, Denver, CO - #A29624.15100)

**323. Public Concern: The Forest Service should avoid relying on public opinion surveys.**

**BECAUSE THEY ARE ERROR PRONE AND UNRELIABLE**

We caution against the reliance on public opinion surveys and interpretations thereof relative to the public's position on NFS management. Absent a close scrutiny of the question and the manner in which the poll was taken these reports are fraught with error and are notoriously scientifically unreliable. (Elected Official, Douglas County, OR - #A11811.15150)

**324. Public Concern: The Forest Service should consider material comments.**

**AS REQUIRED BY THE NATIONAL ENVIRONMENTAL POLICY ACT**

**North Dakota Litigation: *Billings County, et al. v. Veneman***

The ANPR incorrectly describes the North Dakota litigation as sharing a common theme with the other seven pending lawsuits that there was inadequate opportunity for public review and comment. 66 Fed. Reg. at 35919. The North Dakota litigation does not make that allegation. The complaint filed by several North Dakota counties and the Friends of the National Grasslands does allege that the Forest Service violated NEPA by ignoring the material public comments regarding the proposed wilderness or roadless conservation areas, road rights and county royalty rights. Complaint [sections] 11,70. The North Dakota case takes the position that countless comments on the Dakota Prairie Grasslands Draft Plan Revision, the roadless rule and forest road transportation regulations that North Dakota lands managed by the Forest Service are not subject to the same laws and roadless management is both without legal authority and not feasible given the extensive network of roads and rights-of way which run through each and every one of the "roadless conservation areas" in North Dakota. The North Dakota situation is also different because the final plan revision converts the proposed wilderness areas to roadless conservation areas, while purporting to make site specific determinations that these areas have roadless or wilderness

values. The decisions in the DPG Plan Revision are no more accurate nor valid than the roadless regulation now so heavily criticized throughout the country.

The commenters believe that the remedy is not a matter of additional public comment but one of compelling the Forest Service to deal with the facts and the legal issues which apply to North Dakota. So far the Forest Service has largely ignored the material facts because they did not fit the policy decisions already made at the national level. (Organization, Denver, CO - #A21358.10131)

The ANPR incorrectly describes the North Dakota litigation as sharing a common theme with the other seven pending lawsuits that there was inadequate opportunity for public review and comment. 66 Fed. Reg. at 35919. The North Dakota litigation does not make that allegation. The complaint filed by several North Dakota counties and the Friends of the National Grasslands does allege that the Forest Service violated NEPA by ignoring the material public comments filed on the proposed wilderness or roadless conservation areas, road rights and county royalty rights. Complaint [sections] 11, 70. This is an important distinction, because the remedy is not additional public comment but a requirement that the Forest Service actually deal with the facts presented. So far the Forest Service has ignored the material facts because they did not fit the policy decisions already made. (Elected Official, McKenzie County, ND - #A27737.14000)

## *Response to Public Comment*

### **325. Public Concern: The Forest Service should adequately respond to public comment.**

#### **REGARDING SPECIFIC ROADLESS AREAS**

We are troubled by the agency's failure to respond to comments about specific areas that have never been identified as inventoried roadless areas in a process subject to public comment or are otherwise not appropriate for roadless designation. Our July 15, 2000 comments devoted considerable effort to addressing whether particular areas had been properly inventoried as roadless. See July 15, 2000 Comments at 13-19. The Forest Service did not respond to these comments. See Final Environmental Impact Statement Vol. 3. (Permit Holder, Avon, CO - #A28852.10131)

#### **TO COMPLY WITH THE COUNCIL ON ENVIRONMENTAL QUALITY REGULATIONS**

I would also hope that this time around that the Forest Service does a better job in responding to public comments than you did for the DEIS on the Roadless Area Conservation Plan (RACP). Combining, paraphrasing, and then giving general responses to comments resulted in a total loss of any meaning of the comments themselves. Negative comments related to the legality of the whole process, etc. were either glossed over or totally ignored in the RACP FEIS. As a former Environmental Coordinator at the National Forest level (Modoc NF, R5, 1978-86) I find this disregard for the provisions of the CEQ Regulations to be most disturbing. In my opinion this approach violates 40 CFR 1503.4 (a) and (b), both of which require that responses to comments be more detailed, and that the comment letters themselves, or a summary of lengthy letters, be published in the FEIS regardless of their content or perceived merit. Letters from public officials were published, but none from the general public, and this does not meet the spirit of the regulations by any means. (Individual, East Kingston, NH - #A4893.14000)



## Other

### 326. Public Concern: Organizations which solicit comment for federal land policies should assure the public that all comments will be submitted to the appropriate agency.

#### REGARDLESS OF THE POSITION TAKEN BY THE RESPONDENT

I am a reporter for the Record-Courier in Baker City and last week I wrote a guest editorial about Roadless Areas and gave readers an address to write to with your name on it, from a flyer sent out to all college students by the Oregon Natural Resources Council.

Now I believe the address given by the radical ONRC, although addressed to you, was their own address and they have in mind sorting and destroying those letters against the Roadless Areas.

From what I can find out—"American Lands" is "American Lands Conservancy" 726 7th street SE: Washington DC: 20003, and not a part of the U.S. Forest Service as I and others were led to believe at first glance at these flyers.

Thinking that I was writing to the Forest Service, and you, I sent a 21 cent post card, my sister sent one, and my husband signed one and had me mail it. Others also sent cards but I do not know which ones. OPPOSING Roadless Areas.

I want to know whether or not you receive the mail addressed to you at the American Lands address.

If what I suspect is true you are receiving only the part of your mail these people want you to see. (Individual, Richland, OR - #A19215.14140)

## Public Involvement in Decisionmaking

### Summary

**General Comments** – One frequent comment regarding public involvement is that the Forest Service should protect the right to public participation in forest planning. Respondents state that the public "owns" public lands and should always be involved in decisions concerning these lands. People say the Forest Service should be responsive to the public and address concerns from all sectors of society. In order for the Forest Service to do so, respondents suggest establishing strong lines of communication with the public and understand how National Forest management affects local communities. Another respondent also believes that it is critical that dialog with the public be intensive and ongoing, rather than limited to closed-ended comment periods on specific plans. One individual urges the Forest Service to require those who want to participate in forest management decisions to contribute to forest stewardship activities, asserting this would create "a good working relationship between local entities and national management."

**Role of the General Public** – Respondents suggest that the Forest Service should allow all citizens full access to the decisionmaking process and that all viewpoints are considered fairly. Along these lines, others suggest the Forest Service should also ensure interested parties the opportunity to provide site-specific input regarding individual roadless areas so if there is a recognizable local need in a specific area, procedures for granting exceptions to the roadless rules may then be provided.

**Role of Local/Rural Residents** – Some comment that the Forest Service needs to be more inclusive and attentive to local opinions and desires. while others claim that there has never been a federal regulation that considered local input as much.

**Role of Special Interest Groups** – A number of respondents comment on the role of special interest groups. Some request that the Forest Service include certain interest groups in the

decisionmaking process; a few suggesting they be put in charge of public involvement. However, of those who address this topic, most advise the Forest Service not to “pander” to organizations because, they say, such groups want to prevent the majority of the nation from enjoying their lands. A number of respondents assert that the development of the Roadless Rule was orchestrated by specific special interest groups, hence it was not an open, fair rule-making process.

Respondents who comment on the role of resource user groups in decisionmaking advise the Forest Service not to “pander” to such groups. People suggest that the process should respect the will of the people rather than that of “special interests that profit from the consumption of natural resources. Others suggest that the Forest Service exclude resource user groups from the decisionmaking process altogether, because of perceived ulterior motives that do not take into account the health of the land.

**Collaboration Processes** – A number of respondents comment on collaboration processes. Some state that the Forest Service should adequately incorporate collaboration in the decisionmaking process. According to one organization, they do not believe there is any decision made by the Agency that demonstrates collaboration in the planning process, as opposed to simple comment opportunities. Some also suggest models that the Forest Service should follow in collaboration. These models include the Winiger Ridge Ecosystem Management Pilot Project and the Enlibra Process. Others, however, doubt the effectiveness of collaborative processes. Some advise the Forest Service to avoid over-reliance on collaboration. These respondents believe that collaboration is limited to solving easy problems; gives resource user interests unfair influence in decisionmaking; displaces traditional sources of legitimacy, such as the electoral process of representative democracy; and is an unrealistic solution because of the required time commitments. Respondents also state that agreement between parties may not be possible, and that an emphasis on collaboration may lead to policies that are agreeable rather than high quality. In addition, some suggest that the term “collaboration” carries the connotation of bias in decisionmaking.

**Collaboration with States, Local Governments, and Agencies** – A number of respondents offer comment regarding collaboration with specific entities. Some request that the Forest Service collaborate with states and local governments in managing roadless areas. Respondents suggest that this should be done by respecting state regulatory authority, by creating a staff position for a state liaison, or by establishing a state oversight team. Others suggest various entities that the Forest Service should designate as cooperating agencies, such as the states of Montana and Wyoming, and Wyoming county commissioners and conservation districts. In connection with these suggestions, writers state that the Forest Service should establish a consistent system for extending cooperating agency status to local entities. Some also assert that the Forest Service should collaborate with counties and local communities in managing roadless areas.

**Collaboration with Other Groups** – In addition to collaborating with state and local governments, people also suggest the Forest Service collaborate with agencies such as the U.S. Fish and Wildlife Service in forest planning and management of roadless areas. Suggestions for effective collaboration with other groups range from creating a Board of Trustees to employing resource advisory committees to generally recommending guidelines to ensure adequate collaboration. Respondents state that the Forest Service should explain laws and how they apply to decisionmaking, arrange face-to-face working groups of all interests, create partnerships that

are inclusive of all economic levels, and recognize the collaborative efforts of special interest groups.

**Education** – Some respondents believe that the Forest Service should educate the public; they often assert that the Agency should educate people rather than lock them out of the land. Suggested education topics include the importance of managing public lands for the greatest good for the greatest number over the long term, the facts about and benefits of the Roadless Area Conservation Rule, and resource management needs. One individual suggests that the Forest Service adopt the “Wood is Good” campaign to change the way people view wood-based products. People also suggest how public education should be carried out. Suggestions include publishing informative articles, producing a television program regarding roadless areas, and developing a seminar for new users and monitoring all uses.

**Volunteerism** – A number of respondents advise the Forest Service to encourage volunteerism. As one person points out that if people feel strongly enough about an issue, they should be willing to pitch in and help out. Some respondents suggest that volunteerism would be an effective way for the Forest Service to cut maintenance costs. Suggested potential volunteer groups include various user groups, troubled youth, hunters, anglers, and retirees.

### *Public Involvement in Decisionmaking General*

#### **327. Public Concern: The Forest Service should protect the right to public participation in forest planning.**

We understand that the Bush Administration is also trying to amend the laws concerning planning for our National Forests to limit public participation! Since the public “owns” our public lands, it is extremely important that our right to participate in planning be protected. (Organization, Escalante, UT - #A27872.15110)

#### **328. Public Concern: The Forest Service should establish strong lines of communication with the public.**

##### **TO UNDERSTAND HOW MANAGEMENT AFFECTS COMMUNITIES**

The Forest System Land and Resource Management Plan is a contract between the American people and the Forest Service that describes how the American people’s National Forests will be managed. We ask that you develop strong lines of communication with the public and understand how National Forest management affects our communities. (Business or Association, Jackson, MS - #A4824.15000)

##### **BECAUSE MANY PEOPLE DO NOT UNDERSTAND HOW DECISIONS AND LIFESTYLE CHOICES ARE RELATED TO LAND MANAGEMENT**

USFS efforts to communicate with the public about management of national forests can definitely be improved. Congress should allocate funds to allow the USFS to develop and maintain ongoing forums for dialog with the public. The agency should provide training and acquire personnel with backgrounds in social science and public communication, and de-emphasize its historic focus on natural science and extractive industries and material resources. Because humans are more disconnected from the natural world, and out of touch with ways our decisions and lifestyle choices are related to land management than at any time in history, it is critical that dialog with the public be intensive and ongoing, rather than limited to closed-ended comment periods on specific plans. (Individual, Corvallis, OR - #A650.15152)

### 329. Public Concern: The Forest Service should be responsive to the public.

#### BY ADDRESSING CONCERNS FROM ALL SECTORS OF SOCIETY

I appreciate your taking comments on the roadless area plan. I attended many of the meetings and feel that none of my concerns were met. There seemed to be a present plan to close roads with a five mile radius which could ultimately block out the entire forest. (Individual, No address - #A5229.10131)

They continue to say that they had over 600 public meetings and 1.6 million public comments, but of course, they are not available to the working people of the United States. If we had college students writing on our behalf, maybe the Forest Service would have to acknowledge our comments. I've been told by a Forest Service Supervisor that You are not the Sierra Club so I don't have to worry about your input. Needless to say, unless I can get Representative McInnis to assist users in writing to the Forest Service, I believe our comments are useless. Even Rep. McInnis was given the cold shoulder under the Clinton Administration and Bruce Babbitt. (Individual, Castle Rock, CO - #A3628.10132)

ARRA believes that the Federal Government in collaboration with the States, local governments, Native Americans, and other affected individuals and organizations can promulgate policies that truly reflect the needs and desires of a wide range of Americans. When the original Roadless Rule was developed, it was apparent that many sectors of our society were not invited by the government to provide input on this rule. True consensus and respect for policies cannot be achieved unless all stakeholders feel that they had a fair chance to have their voices and concerns heard. If we truly care about appropriately managing and protecting our national forests, then seeking a consensus among a variety of interested parties provides the best means of preserving the country's natural heritage. (Organization, Washington, DC - #A5069.10132)

Thank you for soliciting additional comments on this important rule. When the original rule was released earlier this year, I felt that many of us in the recreational community were not given adequate opportunity to express our concerns and ideas about the roadless issue. Therefore, thank you for re-opening this issue for additional input from those of us who care about the environment and who seek opportunities to recreate on public lands. (Individual, Anaheim, CA - #A5169.10133)

### 330. Public Concern: The Forest Service should recognize that public involvement during development of the Roadless Area Conservation Rule was sufficient.

The ANPR requests input according to a set of questions regarding issues, access, wildfire prevention, forest health, that have already been addressed in the existing policy. **I refuse to engage in a debate so inherently flawed.** We already had the debate to determine the future of public roadless lands, and the people spoke loudly and clearly. They asked the Forest Service to protect roadless lands with a strong national policy, ninety six percent of over a million who commented.

I've heard criticism lately of the "click-and-vote" approach to public input (utilized by both sides of any issue), and I respect your agency's desire for quality input. I don't deny that you received many form letters and "prepackaged" postcards during the earlier go-round that you found relatively useless, but I still take issue with the argument that public input wasn't good enough, wasn't local enough. (Individual, Helena, MT - #A20343.10152)

[Q2] Answer: It is incumbent upon the Forest Service to match the public involvement process to the scope of the issues. Where issues of national import, such as the conservation of wild areas, are on the table, the public involvement process must be national and open to all citizens. Where the issues are primarily of local concern, such as the availability of firewood, then the public involvement process is best targeted to local interests.

The Roadless Rule's promulgation clearly satisfied any rational test for sufficient opportunity for public involvement. The Roadless Rule garnered more comment than any other Forest Service decision in

history. The combination of over 600 local public meetings combined with national media exposure ensured that anyone with an interest in Roadless Area protection would have an opportunity to learn about the Forest Service's proposal and comment upon it. That over 1.58 million people chose to do so is testimony to the outreach effort. (Organization, Craig, AK - #A23228.10152)

[Q9] Again, the people have spoken. There were two years of well-publicized, well-documented public hearings in which all individuals and groups had the opportunity to make their "views, values, and beliefs" about public lands known. Over 90% of the comments generated supported protection of roadless areas. I suppose we could go through that whole process all over again—but what a tremendous waste of public money, time, and energy that would be. The process itself, the most extensive in Forest Service history, is not flawed—the Bush Administration's refusal to accept the results is. (Individual, Cumming, GA - #A21156.10153)

**331. Public Concern: The Forest Service should consider that issues being raised now should have been raised during the public comment period for the Roadless Area Conservation Rule.**

**TO RAISE THEM AFTERWARD AND THEN CRY FOUL IS CONTRARY TO THE INTENT OF THE NATIONAL ENVIRONMENTAL POLICY ACT**

The Federal Register Notices states that this advance notice is intended to give the public the opportunity to comment on key issues that have been raised regarding the protection of roadless areas. These issues should have been raised during the public comment period. To raise them afterwards and then cry foul is not what congress intended when it passed the National Environmental Policy Act. (Individual, Grants Pass, OR - #A30000.20203)

**332. Public Concern: The Forest Service should consider that those who are satisfied with the status quo might not participate.**

The FS must particularly take into account that those who are satisfied with the status quo will seldom make a great effort to participate, as they believe that the current situation will continue. (Individual, Center Sandwich, NH - #A5698.15000)

**333. Public Concern: The Forest Service should consider that the Roadless Area Conservation Rule expressly includes the requirement that input be sought from state and local officials, tribes, and any other interested parties.**

What is the best way for the Forest Service to work with a variety of states, tribes, local communities and individuals in a collaborative manner to ensure concerns about roadless values are heard and addressed through a fair and open process?

This has already been adequately addressed in the final rule of the Clinton Roadless Plan. Needless to say, there has already been a fair and open process over the last two years to hear concerns on the Roadless Plan. The final rule of the Clinton Plan specifically protects tribes, communities and individuals who might have pre-existing rights to activities in roadless areas, by statute or treaty. In addition, the final rule expressly includes the requirement that the Forest Service seek input from state and local officials, tribes and any interested parties in the land management decision-making process. It is important, however, to maintain the restrictions on road construction and logging as the basic legal framework for use planning. (Individual, Olympia, WA - #A6929.10152)

**334. Public Concern: The Forest Service should list the tribes and communities that did not provide input on the Roadless Area Conservation Rule.**

The states, tribes, local communities, and the general public had ample opportunity to review and comment on the proposal. We ask that the Forest Service list the tribes and communities that did not provide input on the original process. The final Roadless Area Conservation Rule addressed many of the

views expressed during the public comment period and incorporated many of the suggested changes. (Business, Spokane, WA - #A22047.15100)

**335. Public Concern: The Forest Service should require those who want to participate in forest management decisions to contribute to forest stewardship activities.**

I believe a good working relationship between local entities and national management would involve some kind of exchange of values. Those who want to participate in management would be expected to contribute some kind of stewardship, such as trail maintenance, wildlife surveys, search and rescue teams, creating educational materials and brochures, whatever they might propose to preserve the value of the forest. (Individual, No Address - #A30157.15100)

### *The Role of the General Public*

**336. Public Concern: The Forest Service should allow all citizens full access to the decisionmaking process.**

The members of this chapter are unalterably opposed to weakening the access of citizens to the federal decision-making process, particularly as that process affects extractive industries like logging, mining, and grazing. (Organization, Davis, CA - #A21666.15120)

All sides of the issues must be given equal access to the process and equal opportunities to express their views. We hope to never again see the closed-door meetings and off-the-record deals that tainted the original rule making process. You must utilize the NEPA process as a means to make decisions, not to rubber stamp decisions already made. Finally, you must restore integrity to the agency and the process it uses. Quite frankly, the agency has a long way to go to regain the trust of any public sector, including those interests the Forest Service's leadership catered to a few months ago. They know first hand how easily strong handed politics could compromise the agency's objectivity. (Individual, Montpelier, ID - #A9058.12230)

**337. Public Concern: The Forest Service should ensure that all interested parties have the opportunity to provide site-specific input regarding individual roadless areas.**

It is unfortunate that the USFS [United States Forest Service] must be mandated by the Idaho District Court to seek meaningful comment from the citizens of the United States on how to best manage 58.5 million acres of public land. Consequently, if the USFS wishes to work with local communities, tribes, governments, and organizations in the management of this land, it is imperative that these entities be able to provide site-specific input regarding individual roadless areas, in addition to national issues pertaining to these lands. Those who wish to actively engage in forest planning and analysis should be actively encouraged by the USFS to help identify potential impacts of management decisions in rural communities. (Business or Association, Sacramento, CA - #A3681.13213)

**SO THAT, GIVEN A RECOGNIZABLE LOCAL NEED IN A SPECIFIC AREA, AN EXCEPTION TO THE ROADLESS AREA CONSERVATION RULE MAY BE PROVIDED**

If there is a recognizable local need in a specific area, then procedures for granting exception to the roadless rules may be provided. The "default" national management position should be to preserve the roadless state. (Individual, Denton, TX - #A156.13213)

### *The Role of Local/Rural Residents*

**338. Public Concern: The Forest Service should solicit and consider local input.**

We strongly encourage the Forest service to solicit, encourage and take seriously comments made by local citizens; local, county and state governmental officials; and other community leaders. This should

occur regarding all actions taken by the agency affecting the various forest management plans and areas of jurisdictions under their supervision. Local citizens, officials and community leaders often have critical “on-site” knowledge on how individual actions on Forest Service lands will affect both the local communities as well as the various resources on the land involved. (Business or Association, Elko, NV - #A20856.15100)

The Forest Service needs to solicit and understand local opinions and desires in a more complete manner. It may take active efforts at conducting opinion polls of the local population, such as was done by the Bitterroot National Forest for their fire salvage efforts. Other methods might entail developing collaborative-based decision-making groups in affected states . . . wherein different interests and skills are brought to the table to manage watersheds. The Forest Service could contract with local mediators/facilitators to run these meetings. Even though many academicians, including the Committee of Scientists, applaud the use of collaborative methods, I highly recommend talking with local professionals and citizens who have participated in these groups for their own perspective. My own experience has taught me that without clearly-defined goals, strict timelines, equal representation, and limits on judicial review, many collaborative-based solutions will end in stalemate as is typical of many Forest Service decisions. (Governor, State of Montana - #A17660.15111)

**339. Public Concern: The Forest Service should allow adequate local input into scoping and planning.**

I want to see more local input into scoping, and EIS planning. I do not like it when the Forest Service comes to me with a plan in place and gives me 4 or 5 options of what they want. Most of the time, it is not what I want. I guess it is supposed to make me feel I have given input when I have not done so. I want more local control over what happens in my area of the forest and I want it up front and not at the end. (Individual, Seiad Valley, CA - #A5092.15111)

**340. Public Concern: The Forest Service should acknowledge that local concerns have been fully and adequately considered.**

I am writing to ask that you maintain current protection of all 58.5 million areas of roadless National forest land protected during the Clinton Administration.

The Bush administration is seeking to amend the policies of the Clinton administration by saying that local interests had not been fully consulted prior to the development of the rules. This statement is a lie. In fact, NO federal regulation has EVER been based on so much local input. The Forest Service held more than 600 hearings around the country, and reviewed a record 1.6 MILLION public comments. (Individual, Bloomfield, NM - #A1606.10151)

The Roadless Area Conservation Rule was developed through the most extensive public involvement in the history of federal rulemaking or environmental review. Of the official submitted comments, 95 percent supported the strongest possible protection for remaining roadless areas. The Forest Service contends that local opinions and comments were not adequately considered in the first public process, apparently because the views of logging, mining, and mechanized recreation were minority views in that process. These special interests had the same opportunity as anyone else to make their views known. Response like that is not generated if opportunities and announcements are sparse. (Individual, Seattle, WA - #A3716.10151)

### *The Role of Special Interest Groups*

**341. Public Concern: The Forest Service should include environmental interest groups in the decisionmaking process.**

Seek response from Sierra Club, and other environmental groups. (Individual, Del Mar, CA - #A868.15121)

The Forest Service should stop preparing for timber sales that violate the rule, and they should stop collaborating to weaken the rule. They should begin a genuine defense of the Rule in court, and solicit the help of credible and publicly accepted environmental organizations. (Individual, Hatboro, PA - #A17972.12230)

#### **THE THEODORE ROOSEVELT CONSERVATION ALLIANCE**

The TRCA is one of the best conservation groups which applies common sense and not radical policies and tactics. Please listen to them and involve them in all policy making in this area. They are another sane voice who like the RMEF is making a difference for wildlife and the wild areas we love. (Individual, Boulder, CO - #A3954.15121)

### **342. Public Concern: The Forest Service should recognize that conservation organizations have the same interests as all citizens.**

#### **THAT IS, TO ENSURE GOOD PUBLIC POLICY AND PROTECTION OF FINITE RESOURCES**

I would like to say a word about these [conservation] groups, which are often spoken of as if they were just another special interest. This is a misunderstanding; they do not represent their own interests in the same sense as timber companies, for example. They have no financial stake in the outcome. They are information gatherers. Their interest is the same as that of all citizens, to ensure that we make good public policy and do not squander our finite resources. (Individual, Juneau, AK - #A23012.15121)

### **343. Public Concern: The Forest Service should consider putting environmental groups in charge of public involvement.**

#### **BECAUSE THEY HAVE A RECORD OF DOING SO SUCCESSFULLY**

The endless number of meetings that were held were fair and open. But the agency will never, in my lifetime anyway, learn to do public involvement. This won't change under Dale Bosworth/Mary Rey/George Bush and can be expected to get worse. There was a public meeting put on by the north end of the Gifford Pinchot National Forest and the Olympic National Forest. It was held in Olympia. It was poorly done, and all "sides" went home dissatisfied. Later, a local environmental group called the Gifford Pinchot Task Force obtained the mailing list and sent out a mailing to everyone and invited them to another meeting. This one was held at a local community gathering place in the rural community of Randle, Washington, on the north end of the Gifford Pinchot National Forest. The local District Ranger was invited and attended. There was a panel composed of a very diverse constituency. A lively discussion ensued. The Task Force even offered to assist local community members in writing their response to the draft RA rule—knowing that many of these folks did not agree with them. Perhaps one should put environmental groups involved in Forest Service public involvement. This was not the first time such groups had to take the lead on broad public involvement and did it successfully. (Note: the public involvement meetings for the new NFMA regulations were even worse.) But, again, public involvement occurred in spite of this and through way over one million letters, cards and emails. The American people felt heard (until now). (Individual, Olympia, WA - #A4503.14200)

### **344. Public Concern: The Forest Service should exclude environmental interest groups from the decisionmaking process.**

#### **ENVIRONMENTAL STAKEHOLDER COUNCILS**

Remove environmental stakeholder councils immediately and remove seed money or grant money that is given with strings attached. The Forest Service should rely on local input and local control. (Individual, Albuquerque, NM - #A10497.15000)

### **345. Public Concern: The Forest Service should not pander to environmental interest groups.**

There seems to be something dreadfully wrong when advocates for the preservation of public and private resources (retaining for posterity) have more influence over our government agencies and the



legislation than do the majority of the citizenry. The problem with the preservation segment of our society is that they will not be able to make a living if they cannot make a living off of the paranoia of a few misguided supporters. Human life, the ability to make a living and enjoy our natural resources is the framework on which this country was built. Roadless areas are part of the continuing saga of bureaucratic government control that continues to lead to improper use of our renewable resources. I assume that preservationists would like to see dinosaurs roaming the earth. (Individual, Warren, AR - #A9095.15120)

We must point out that pandering to preservation interests has not worked in the past and will not work in the future. When you are conducting forest planning in a responsible manner aimed at management of forest resources, you will have the support of IFOA. IFOA recognizes that we have a big stake in responsible management of national forests. (Business or Association, Coeur d'Alene, ID - #A15260.15120)

I am convinced the anti-forest use movements are movements of greed and selfishness. This was well illustrated by [a representative] of the Environmental Protection Information Center in Garberville, California. He was quoted in a recent *Backpacker* magazine article as saying, now that the Headwaters is preserved, "We need to be conservative and not throw the gates open to everyone." In other words, now that we have created our own private preserve, let's make sure no one else gets in.

A while back, on the Discovery Channel, I saw a program dealing with the Cold War and, more specifically, the roles the CIA and KGB played in the Cold War. The elder President Bush, a former CIA Director, was on the program. A former high-ranking KGB official was also on the program. The latter said the *KGB used the West's environmental movement*.

Just think of the implications of these statements. Could there be some relationship to PETA, ALF, ELF the Eugene, OR and Seattle, WA anarchists, Earth First!, and so on? Could these be indicative of a fundamental shift toward a more socialist American society? I have to wonder.

I am convinced the environmental community is holding the federal government hostage. They get what they want because the federal government routinely caves in to tree-sitting, tree spiking, etc. (Individual, No Address - #A25635.15121)

#### **BECAUSE THEY WANT TO LOCK OUT THE MAJORITY FROM PUBLIC LANDS**

The environmental radical movement has latched onto watershed, wildlife, and scenic value protection to lock out the majority of the nation for enjoyment of their lands. Urban dwellers who are sending in thousands of cards are uninformed on the resilience of nature and how special characteristics can be protected while allowing roads and motorized use. (Individual, Alturas, CA - #A28581.15121)

I have attended many USFS meetings and am appalled that "conservation" and "environmental" groups advocate non-use of national forests. At the Regional meeting held in Atlanta, GA. those groups advocated zero timber harvest, zero mining, zero grazing, and zero "motorized" use of national forests. They said they wanted all roads "decommissioned and obliterated," private property owners (inholders) bought out, and the lands proposed for Wilderness designation. This is totally unacceptable and inappropriate for national forest lands. They were established, by the US Congress, to "meet the needs" of the American people. That means ALL the American people, not just them, and includes natural resource production. (Organization, Three Rivers, CA - #A28739.15121)

#### **346. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule was orchestrated by environmental groups.**

The initial rule making, orchestrated by giant environmental organizations, was designed to lock up in perpetuity over 60 million acres of national forest lands in one massive land grab. To gain public support for this radical move, these groups targeted urban areas with misinformation and input drives, making the massive lockup appear overwhelmingly supported by the American people. Most of this input came from well meaning folks who didn't have a clue as to where these units were or what was on them. In fact, no one knew with any certainty where they were or what the trade-offs were. This strategy pitted

the interests of rural Americans in the sparsely populated areas where most of our national forest lands are actually located, against urban America, where much of the population and political power lies. (Individual, Lewiston, ID - #A2872.15121)

Remember, the huge amount of input on the first go around for the Clinton Roadless Area, was supplied largely by preservationists through mass e-mailing. There really is a silent majority out there and the Forest Service should not always try to grease the squeaky wheel, which was the case in the Clinton administration (or lack of administration). (Individual, Aloha, OR - #A3675.15121)

I have not answered the individual questions of the survey because I don't think I have anything specific to add to the response of the Retired FS Employees. I would just like to make one point and reinforce another. I am happy to see the Forest Service reviewing the Clinton Roadless proposal. It was a closed door deal made with selected "environmental" groups which was a done deal by the time it was announced. Most of us realized that even as we participated in the public comment process. The result was another step in the process to turn all the national forests into ad hoc wilderness. (Individual, Greensboro, NC - #A5306.15121)

In oversight hearings held by the U.S. House Resources Subcommittee on Forests and Forest Health, Subcommittee, it was found that the Heritage Forest Campaign, created by the National Audubon Society form more than \$3.5 million in tax-free grants from the Pew Charitable Trusts organized a coalition of environmental groups, including The Wilderness Society, the Sierra Club, and others, for the purpose of influencing future management of approximately 60 million acres of national forest lands. Based on the analysis of thousands of documents obtained from the past Administration and the agency, the House Subcommittee concluded that a handful of environmentalists in the Heritage Forest Campaign had unprecedented, and possibly illegal influence on the past Administration. These individuals had continuous access at all levels to the Federal employees that were directly involved in the creation of the RACR. This access was not limited to meetings, which were numerous, but included the providing of draft language, legal memoranda, and survey research data to the Administration, which was then used to develop and justify the roadless initiative. (Organization, Salt Lake City, UT - #A15263.15121)

[From Attachment 2] On October 28, 1999, the Committee on Resources requested documents from the Forest Service and the White House concerning the President's initiative to restrict use on 40 to 60 million acres of "roadless areas" on the National Forests. Staff has to date received, and conducted a preliminary review of, thousands of pages of documents provided by the Administration.

A preliminary review of these documents reveals that the Administration's decision was made improperly, in apparently violation of the due process rights of affected parties, as well as applicable statutes enacted by Congress to protect those rights, such as the Administration Procedures Act (APA) and the Federal Advisory Committee Act (FACA).

Information received in response to the document request indicates that the Administration's roadless area initiative was developed in an environmental vacuum—with virtually all input coming from a select few in the environmentalist community.

These individuals had continuous communication with, and access to, the Federal employees that were directly involved in the creation of the rule-making.

This access was not limited to meetings, which were numerous, but included the providing of draft language, legal memoranda, and survey research data to the Administration, which was then used to justify and frame the roadless area rule.

The structured relationship between the Administration and environmentalists is of serious concern, but more significant is the lack of any evidence of even a token effort by the Administration to involve other interested parties. This disregard for any balance in the advice being solicited is evidence of both the pretextual nature of the decision, which had clearly already been made, and of lack of concern for any adverse consequences on the affected users of the forest lands in question. (Individual, East Helena, MT - #A20422.15121)

**347. Public Concern: The Forest Service should not use environmental groups as moderators in the public involvement process.**

In my experience so far with HCCA, which seems to have assumed the role of gatherer of community input, there is anything but transparency, willingness to allow discovery, and open-mindedness. Since the new comment period and process of gathering input is unknown to the general public has not been well publicized, there should be more effort to recruit public opinion in a nonbiased arena. Biased groups such as HCCA should not be placed in a position as moderators of this process. (Individual, Littleton, CO - #A13845.15152)

**348. Public Concern: The Forest Service should recognize that conservation groups falsely appear to outnumber those favoring responsible land access.**

I would like to point out that in recent years it has been demonstrated to me through experience that organized groups in favor of banning land access and prohibited motorized vehicle use on public lands may at times falsely appear to outnumber those in favor of maintaining access, but only for now. As one who has many personal friends and family involved in several of the conservational groups, I realize their tactics and know they have been effective in fabricating the appearance that a vast number of Americans approve of limiting land access for recreational activities. However, my own and many, many others' personal experiences tell something quite different. Given time, Americans for responsible land access and motorized vehicle use will come forth, as is evidenced by several of these groups' recent growth. We should not ignore those Americans who have yet to speak their views on this topic, for there are a vast number of unspoken voices as yet in favor of maintaining land access for all. (Individual, Salt Lake City, UT - #A27590.15120)

**349. Public Concern: The Forest Service should exclude industrial interest groups from the decisionmaking process.**

Again, in the twilight of the last remaining relatively undisturbed sanctuaries of this nation's (and part of the world's) forest ecosystem biodiversity, the notion of bringing exploitative interests into the process will at best muddy the process of protection of roadless areas, and at worst, encourage "balanced uses", effectively emptying the last in our reservoir of undisturbed forest land. The goal of Roadless Area stewardship should be bringing the best science to the single goal of preserving the last remaining tracts of forest biodiversity.

Would one bring the Band-Aid salesman, the ambulance driver, the hospital gift-shop employee, the recovery ward night custodian into the decision making process for a case of major surgery? Certainly all of these folks are personally affected, but do they have anything meaningful to offer outside of their own parochial interests when the patient is nearly terminal? (Individual, Goldendale, WA - #A21668.50100)

**350. Public Concern: The Forest Service should not pander to industrial interest groups.**

Apparently you are counting on our ignorance of what is going on, or our sheer fatigue from previous efforts to further this most important initiative, in order to promote the interests of the logging companies and mining interests who use the National Forests as their private preserves.

The reshaping of our forests by extractive industries, road-building and poor management has left them vulnerable to fire, disease and the spread of exotic weed species. We are fortunate that some of the less desirable or accessible areas have so far escaped this degradation. I ask you to listen to the voices of individual citizens, and to reread the great number of letters already in your files, and make the wise decision to set aside these areas for the sake of our children and their children. (Individual, Marshall, NC - #A13223.15122)

If it were only an issue of just "individuals and groups with strongly competing views, values and beliefs" this would simple. But it is not. This is an issue of the interests of the people versus the interests of big money. The Forest Service (and Congress and the Bush administration) would do well to

remember that the National Forests belong to the American people, not the government and not industry. Bowing to the will of special interests that are backed by industries that profit from the consumption of natural resources and destruction of natural, life sustaining processes on public lands often at the taxpayer's expense is shortsighted and inherently a conflict of interest to the Forest Service's expressed claim of "Caring for the Land and Serving the People." (Individual, Seneca, SC - #A22097.15122)

It seems that this process is slanted to benefit industry and only industry. I urge you to respect the will of the millions of individuals who have already clearly stated that we want our remaining wild areas to remain wild. Don't change the rule for the short-term gain of the logging industry and others, while creating long-term loss for people and wildlife. (Individual, Missoula, MT - #A19233.15122)

### **351. Public Concern: The Forest Service should include special interest groups in the decisionmaking process.**

#### **LOCAL AND NATIONAL ORGANIZATIONS**

Brundage feels that the solicitation of input from user groups, such as the Forest Service is doing by means of this July 12, 2001 request, is the best and appropriate means of ensuring that all of the various interested parties have an opportunity to be heard and participate in this process. This should include local as well as national organizations, such as the National Ski Areas Association (NSAA). National organizations are often able to provide broad, nationwide direction and concerns that local organizations sometimes overlook. (Permit Holder, McCall, ID - #A15317.15162)

#### **OUTFITTERS AND BACKCOUNTRY GUIDES**

More information could be obtained from outfitters and guides already in the backcountry than from forest service employees riding around in trucks on roads. I know this for a fact because I have been in the capacity of guide and outfitter and have seen the activities of the forest service; their range is too limited off road to be of much value to conservation. (Individual, Howell, MI - #A13742.14000)

#### **OFF-ROAD VEHICLE USERS**

I believe it is important to point out that ORV users have been unfairly singled out as the single cause of environmental damage on our public lands. All across our nation, public lands are being closed off to ORV users while hiking, backpacking, equestrian, bicycling, and in some cases even ATV access has been maintained, expanded, and encouraged. No other group of users has come forth and assisted in the cleanup and maintenance of public lands like ORV users have yet they still continue to be much-maligned and subsequently denied access. I personally consider this to be a mockery of the founding principles of our great country. The public lands are to be protected for the people, not from them.

Despite having representative organizations all across the nation, ORV users have often been left out or ignored in the planning process for public land use. (Individual, Saint Louis, MO - #A629.15123)

### **352. Public Concern: The Forest Service should exclude special interest groups from the decisionmaking process.**

#### **STAKEHOLDER COUNCILS**

Stakeholder councils should be removed, and plans should be submitted by local users to local jurisdictions, whereby citizens of those jurisdictions can legally vote to approve the plan they feel best represents a balance of resource development and protection. (Individual, Aptos, CA - #A16303.15111)

## ***Collaboration Processes***

### **353. Public Concern: The Forest Service should adequately incorporate collaboration in the decisionmaking process.**

Assertion: NFMA is a "highly collaborative process" (p. 3). Were this true, it would have, analytically, no bearing on whether that process failed systematically to account for the cumulative, national level

impacts of roadless area conversion and road system expansion. In point of fact, NRDC is aware of no study that demonstrates actual collaboration in the planning process, as opposed to simple comment opportunities. Moreover, our organizational experience has virtually uniformly been that, far from collaborating, national forest decision-makers routinely refuse even to consider the management alternatives suggested and substantiated by citizen activists, giving the public no "horse in the race." (Organization, Olympia, WA - #A20145.15150)

**354. Public Concern: The Forest Service should allow flexibility in collaboration processes.**

The Forest Service can also serve an important function in brokering agreements over the use of Forest Service lands for energy production. As an example, the amended rule should include the flexibility for all parties to enter into collaborative agreements that benefit the forest. This could include offsets for surface disturbance (i.e. an acre disturbed on the forest will be offset with reclamation of disturbance in another part of the forest as agreed upon by the parties). The net result is that when the mine reclaims the surface disturbance associated with the operation, as is required by state and federal law, the forest will benefit from not only the reclamation associated with the mining operation, but with the offset reclamation done in another part of the forest. The same principle could be applied to wildlife habitat or other important facets of forest management. (Business, Wright, WY - #A23085.15162)

**355. Public Concern: The Forest Service should place limits on the number of active collaborative groups that operate regionally, on a concurrent basis.**

The USFS must place limits on the number of active collaborative groups it operates regionally, on a concurrent basis. Presently, contributing volunteer members of multiple, concurrently active collaborative groups find themselves "coming and going", especially in situations involving multiple national forests and lower population density rural counties in and around those national forests. (Organization, Moscow, ID - #A15318.15162)

**356. Public Concern: The Forest Service should follow the model of collaboration used in other planning processes.**

**THE COLLABORATIVE STEWARDSHIP PROCESS USED BY THE CHUGACH NATIONAL FOREST**

The collaborative stewardship process used by the Chugach National Forests in its Forest Plan Revision provides an excellent model for meeting this objective. An important element of this effort is that a public survey was completed to verify that the attitudes of local residents were relatively consistent with the input that was being received by those who actively participated in the planning process. (Organization, Anchorage, AK - #A17358.15111)

**THE WINIGER RIDGE ECOSYSTEM MANAGEMENT PILOT PROJECT**

Instead of thinking in terms of the good guys and the bad guys we may come up with a very different philosophical understanding based on our observations of nature. In our area there is an effort that may serve as a helpful model of agencies, Forest Service, local landowners and environmentalists working together to become informed and create a situations where certain areas might be protected in a more natural state and in other areas of greater wildfire risk to landowners people are taught and offered a variety of means for protecting their homes and property. It is called the Winiger Ridge Ecosystem Management Pilot Project. (Individual, No Address - #A4477.15162)

**THE ENLIBRA PROCESS FOR TAKING ACTIONS IN THE WEST**

If the Fed wants to take actions in the West (just like it does back East), it needs to use as model the Enlibra process as outlined by Western governors. Here in Western Colorado, citizens have been doing just that with our regional Public Lands Partnership. In fact, our regional collaborative process is hosting a conference, Communities Engaged in Public Land Planning: Setting the Course for the Future (see <<http://www.fs.fed.us/r2gmug/>>). I invite you to attend. (Elected Official, San Miguel County, CO - #A4549.15152)

**357. Public Concern: The Forest Service should recognize that groups unwilling to collaborate have no legal standing.**

The Forest Service can effectively work with interests of competing values by requiring that they work collaboratively in the process. If they are not willing to sit down with other interests and work out a solution then they have no standing legally. (Business or Association, Sandy, UT - #A15656.15162)

**358. Public Concern: The Forest Service should avoid over-reliance on collaboration.**

**TO AVOID DISPLACING TRADITIONAL SOURCES OF LEGITIMACY, SUCH AS THE ELECTORAL PROCESS OF REPRESENTATIVE DEMOCRACY**

Popular ideas, such as collaboration, may not always be as good as they seem. Currently, popular ideology suggests that public agencies should shape public policy by relying on collaboration among local stakeholders. While collaboration has its appropriate uses, over-reliance on it can displace traditional sources of legitimacy. For example, agencies that have derived their legitimacy from the electoral process of representative democracy would be forced to secure a direct sanction from parties affected by the use of the collaborative process.

The collaborative process requires stakeholders of a community to seek agreement on the resolution of their dispute. Some proponents of the collaborative process believe that it entails finding stakeholders who have the power to make commitments to support an agreed upon solution, as well as persuading any of their followers to do likewise. Generally, the government is expected to embrace the agreed upon policies. This idea is being advanced particularly in the context of decisions that are made by land management agencies like the Forest Service. In the case of the roadless rule, the Bush administration is applying this concept to a policy decision of national scope. (Organization, Nevada City, CA - #A4941.15111)

**TO AVOID CREATING POLICIES THAT ARE MERELY AGREEABLE RATHER THAN HIGH QUALITY**

Local collaborative efforts shift the ultimate goal away from reaching a quality decision and move it toward reaching a merely agreeable one. Such a process can lead to policies that are based on cumbersome compromises of principles, the lowest common denominator, and on the most tractable but least important issues. In essence, collaboration can actually inhibit genuine innovation. (Organization, Plymouth, MN - #A7116.15000)

**BECAUSE IT IS LIMITED TO SOLVING EASY PROBLEMS**

As a long time participant in collaborative processes (which are good) they are limited to solving easy problems, and thereafter they stall when no consensus can be found to deal with fundamental problems. (Organization, Arcata, CA - #A21665.15162)

**BECAUSE AGREEMENT BETWEEN PARTIES MAY NOT BE POSSIBLE**

You are on the right track with your request for response on the roadless issue rather than the Clinton/Gore process, which everyone knew was a scam. Your questions are thoughtful and if responded to honestly, with real concern for the roadless areas by all parties, should give you a good basis on which to make your decisions. The process can be considered democratic but it is not a popular vote. You will never get anything close to agreement from all the stakeholders on the roadless question because the views are so polarized and strong. In the end the USFS will have to make the tough choices based on what is best for the forests themselves and the flora and fauna that live there, tempering that decision on what impact the choice made will have on man. In my opinion, local communities matter more than national environmental organizations on these matters. Impact on man matters at least as much as impact on other living things. You are having an open process now but it may not be possible to have a collaborative process. Take the Tongass National Forest for instance. Years of negotiations on the Tongass Land Management Plan produced a plan that took away most of the forest for timber production, but assured a small steady supply of timber for small business to manufacture forest products. Some roadless areas were open for harvest with aerial extraction. After the TLMP was put into place these same groups sued to stop the logging in the roadless areas and along comes the Clinton/Gore roadless plan and proclaims no logging at all allowed in the roadless. What god did all the good faith

collaboration do here? None at all. That is why in the end the USFS must make the decision and be supported by the legislative and judicial branches of the government. It is the only way. (Individual, Portland, OR - #A15710.15111)

**BECAUSE IT GIVES RESOURCE USER INTERESTS UNFAIR INFLUENCE IN DECISIONMAKING**

Local collaborative efforts have become little more than big group hugs where the stakeholders, mostly development interests, may feel warm and fuzzy all over but leave forests, fish, and wildlife out in the cold. The Quincy Library Group (QLG), a local consensus building group charged with developing a management plan for three National Forests in the Sierra Nevada, is a case in point. Most theorists agree that all stakeholders with a real interest in the outcome ought to be members of the collaborative group. But in rural communities, like those in the Sierra, such a broad representation of voices is not always feasible. Many environmentalists with an interest in the QLG are based in the urban centers of San Francisco and Los Angeles, making it difficult for them to attend regular meetings. Consequently, the QLG was largely dominated by Sierra Pacific Industries, the very timber company that would be awarded logging contracts on the Lassen, Plumas, and Tahoe National Forests. As a result, the QLG recommended a plan that would double the logging in those forests, push imperiled species such as the California spotted owl, Pacific fisher, American pine marten, wolverine, and northern goshawk closer to extinction, and create fuels management programs that would actually increase fire severity and risk to nearby communities. More often than not, local collaboration means big timber, mining, oil, ranching, and other development interests call all the shots. (Individual, Cottage Grove, OR - #A27337.15122)

**BECAUSE THE TIME COMMITMENT IT IMPOSES MAKES IT AN UNREALISTIC SOLUTION**

I have read several texts about collaborative stewardship and attended training sessions, some sponsored by the Forest Service. While an inspiring ideal, collaborative processes require an extensive time commitment difficult for citizens to maintain in today's world. There are several key ingredients required for success, such as a skilled impartial moderator, a diverse group of stakeholders willing to listen to each other, and commitment by leadership to implement the recommendations of the collaborative group. Because these are difficult requirements, I do not think it is realistic for the Forest Service to prescribe collaborative processes across the nation as a solution to conflict. (Individual, Sitka, AK - #A15506.15162)

**359. Public Concern: The Forest Service should consider that collaboration cannot occur until those who are party to litigation over the Roadless Area Conservation Rule recognize the authority of federal acts.**

The State of Idaho is suing the Forest Service over the Roadless Rule as well as the Fish and Wildlife Service over the reintroduction of gray wolves. The Forest Service should work with groups (including governments) that are willing to accept federal authority. Until the State of Idaho (and others involved in Roadless Rule lawsuits) recognizes the authority of federal Acts (ESA, NFMA, NEPA, CWA, etc.), there can be no "collaboration." (Individual, Lewiston, ID - #A29569.15162)

**360. Public Concern: The Forest Service should recognize that the term "collaboration" carries the connotation of bias in decisionmaking.**

Everyone must have equal access to the process and equal opportunity to express their views. We hope the back-room deals at the national level, which marred the initial rule making, are things of the past. The word "collaboration" carries a negative connotation, one of cozy deals and distorted information favoring one point of view or another. Decision makers must maintain their objectivity and assure a lack of bias in data collection and its use. The image of your agency has been badly tarnished by real or perceived coziness with special interest groups. The NEPA process was corrupted in the rush to complete massive national initiatives before the last administration left office, becoming a means to confirm decisions already made. The Forest Service as an agency will have to prove its professionalism before re-earning the public's respect, especially at the local, adjacent community level. (Business, Lewiston, ID - #A7991.15110)

## Collaboration with State and Local Governments

### 361. Public Concern: The Forest Service should collaborate with state and local governments in managing roadless areas.

I hope and pray agreements can be reached between states and the USDA-Forest Service regarding roads and roadless areas. (Individual, Roy, UT - #A1655.12310)

The MCD would recommend that the process be re-opened but this time at the local forest level. As a procedural law, NEPA provides opportunities for the public input in federal land planning activities. The process allows for all citizens to participate, yet recognizes the importance of state and local government involvement. Locally elected officials (County Commissioners and District Supervisors in Wyoming) directly represent the people that live in the areas of the several national forests. By allowing and supporting the meaningful involvement of local and state government the Forest Service will surely obtain the information they seek concerning roadless values. These types of relationships should be the focus of the Forest Service planning efforts and local Forest Supervisors should be allowed and encouraged to continue and increase these working relations with state and local governments whose constituents are affected by these decisions. (Conservation District, Meeteetse, WY - #A17665.12313)

#### BY RESPECTING STATE REGULATORY AUTHORITY

Any rule governing roadless area management should provide for close collaboration with state governments. Congress has provided that States are to have a meaningful opportunity for participation in the forest planning process. 16 U.S.C. [section] 1612(a). In addition, the States' role within the federal system demands that management decisions respect the sovereign concerns of the States as the trustees of natural resources such as fish, wildlife and water. The States' authority to regulate environmental conditions also must be respected, especially as it relates to water quality. Congress has mandated that federal land management activities must comply with state water quality regulations. 33 U.S.C. [section] 1323(a); *see also Oregon Natural Desert Ass'n v. Dombeck*, 172 F.3d 1092, 1098 (9th Cir. 1998) ("Section 1323 plainly applies to nonpoint sources of pollution on federal land"). Collaboration during initial rulemaking can help prevent future conflicts and will promote the mutual goal of cooperative federalism.

Collaboration with state governments is especially needed in those situations where state lands are adjacent to, or intermingled with, national forest lands. While access to intermingled state lands is guaranteed by existing statutes, such access can be hampered by restrictive management prescriptions that do not provide, up front, for future road construction necessary to reach state inholdings. By working together, the state and federal government can build state access requirements into the forest land planning process, so that future access is expedited. (Governor, State of Idaho - #A20141.15130)

#### BY CREATING A STAFF POSITION FOR A STATE LIAISON

Forests should make available, on their staff, a position that is appointed and paid for by the state's governor. This position would participate in planning meetings, inspections and other activities and serve as a liaison between the governor's office and the National Forest. The incumbent in this position would give input and make recommendations to the Forest but would not have approval authority.

This would show a strong commitment by the Forest Service to consider the state's economic and social needs concerning Forest policy. (Individual, No Address - #A26264.15130)

#### BY ESTABLISHING A STATE OVERSIGHT TEAM

If roadless rulemaking is to legitimately proceed, we recommend that the Forest Service establish a state oversight team that can participate on a regular basis in future rulemaking. A good beginning model for such a team is the Interagency Team that had significant input into the promulgation of the Roadless Rule. A committee of state representatives could be established that would meet regularly with Forest Service personnel working on roadless issues to review work and suggest revisions or alternative approaches. Such a process could give the States a real voice in this important issue without intruding on the Forest Service's statutory authority to manage and preserve our National Forests. (Governor, State of Idaho - #A20141.15162)



**362. Public Concern: The Forest Service should designate specific entities as cooperating agencies.****STATE OF MONTANA**

I again ask that the Forest Service designate Montana as a cooperating agency under NEPA and 40 C.F.R 1500-1508. After careful consideration, we believed that it was vitally important to the resources within Montana and our communities that we assume that role. We continue to subscribe to the view. (Governor, State of Montana - #A17660.15131)

**STATE OF WYOMING, COUNTY COMMISSIONERS, AND CONSERVATION DISTRICTS**

We feel that the State of Wyoming, County Commissioners and Conservation Districts should be given cooperating status at the earliest time. (Conservation District, Sublette County, WY - #A28888.15141)

**WESTERN STATES**

In order to establish an effective forest planning process at the local level the Forest Service must be willing to work cooperatively with the appropriate and necessary stakeholders. The Forest Service should grant Western States cooperating agency status under the National Environmental Policy Act (NEPA). This cooperative effort will allow local resource managers to undertake stewardship activities such as forest thinning that will return the forest to a more natural condition, reduce fire, insect and disease hazards and reduce the risks to public safety on a forest-by-forest level. (State Agency, Denver, CO - #A2332.15131)

**363. Public Concern: The Forest Service should establish a consistent system for extending cooperating agency status to local entities.**

The Forest Service needs to establish a consistent system of working with local governments, state agencies, and associations. In Wyoming, the Forest Service used a government-to-government format while giving county and state officials the impression that they had cooperating agency status under NEPA. In fact, in North Dakota and Wyoming, the extent of state and private land plus county legal interests qualify both the state and county officials for cooperating agency status. If this had been done, then the Forest Service would be required to follow appropriate agreement format so that each party understood the role and what its responsibilities were. (Organization, Denver, CO - #A21358.15130)

**364. Public Concern: The Forest Service should include western governors in the development of roadless area guidelines.**

We enclose two WGA policy resolutions regarding roadless areas, Policy Resolution 99-030 and 00-021. These resolutions state that Western Governors should be included in front-end development of guidelines implementing roadless plans and that collaboration by the federal government with the states is important in making sound land use decisions. (Association, Denver, CO - #A19392.15153)

**365. Public Concern: The Forest Service should revise federal regulations.****TO BETTER SOLICIT INPUT AND COOPERATION FROM STATE AND LOCAL GOVERNMENTS**

The existing regulations contain provisions for Forest Service consultation with the involvement of each of the categories of persons and groups mentioned in Issue #2 at 66 Fed. Reg. 35919-20. However, the regulations don't necessarily provide the "best way" for such consultation and involvement to occur. COHVCO suggests that the following changes to the present process should be made.

First, regarding the involvement of state and local governments, the regulations are somewhat vague and therefore should be revised. The meaning of the phrase, "Contribute to the streamlined coordination of resource management plans or programs," (36 C.F.R. [sec] 219.14(b)) is not clear. The Forest Service should be required to solicit and obtain the cooperation of state and local governments throughout both the process of forest planning and the implementation of site-specific resource management decisions. Too often in the recent past have decisions made at the national level failed to include local participation to any significant degree. When this occurs, often local economies and ways of life are harmed or

destroyed. Avoiding consequences of this sort must be the highest priority of the Forest Service. (Organization, Denver, CO - #A29624.15130)

**366. Public Concern: The Forest Service should collaborate with counties in managing roadless areas.**

A very high percentage of the proposed roadless areas in our county have roads and have been managed for years. We would like to work with the United States Forest Service and manage the forest in our area to be healthy forest, including the animals, trees and the other aspects of the forest. It is important that we talk and work together because our county is 84 percent publicly owned and the county next to us is comprised of 92 percent public land.

Please believe me when I say we care about our area, but we need to be heard and be real part of the future plans. (Elected Official, Lake County, MN - #A1600.12313)

In December 1999, responding during the comment period on the Roadless Area NOI, Crook County sent a letter strongly opposing the proposed roadless rule on the grounds that the rule violates the multiple use principle upon which the Forest Service was founded and negates the forest planning process at the local level. Crook County has a land use plan in place that supports continued multiple use of the forest and identifies the involvement Crook County should be allowed in the decision making processes of federal and state agencies when actions are proposed that will potentially impact the county. (Elected Official, Crook County, WY - #A15545.50200)

The appropriate role of local forest planning regarding the Roadless proposal is to ensure compliance with all laws and regulations. The National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations are the key federal law and regulation. The pending Roadless proposal is under NEPA and its CEQ regulations. Sierra County Commission requested last year to be a partner in the Environmental Impact Statement process. Unfortunately, Sierra County Commission did not receive any response regarding our request pursuant to 40 CFR 1506.2. Hence, the appropriate role of the Forest Service is to follow the rules and procedures of NEPA and CEQ, and request that the State and affected counties be involved, government-to-government, in the environmental analyses and documentation. (Manager, Sierra County, NM - #A22059.20203)

**367. Public Concern: The Forest Service should consider that consultation with other agencies, states, and American Indian tribes was not complete prior to issuance of the Roadless Area Conservation Rule Final EIS.**

The FEIS fails NEPA by not providing a full disclosure of potential impacts to the public. Consultation with other agencies, states, and Indian tribes was not complete prior to issuance of the FEIS. (Professional Society, Anchorage, AK - #A21707.10131)

**368. Public Concern: The Forest Service should *only* notify states and American Indian tribes of pending federal actions.**

Of the groups listed above, the only ones which should receive special notification of pending Federal actions and who should be asked for their advice and counsel are the tribes, and to a lesser degree, the States. Special emphasis must be placed on tribal wishes for the lands. (Individual, Grangeville, ID - #A830.15130)

**369. Public Concern: The Forest Service should make collaboration a goal of the public involvement process at the local level.**

**RATHER THAN AT THE NATIONAL LEVEL**

The problem with collaboration is that it is difficult to achieve on a National level. The present rule does not consider individual area problems or any type of cooperative solutions. Collaboration should be a

goal of the process at the local level in developing the areas as well as solutions to issues and management guidelines. (Business, Nevada City, CA - #A11695.11120)

**BY ENCOURAGING LOCAL GOVERNMENTS TO HELP IDENTIFY IMPACTS ON RURAL COMMUNITIES AND OTHER LANDOWNERS**

States, tribes, and local governments who wish to actively engage in forest planning and analysis should be encouraged to help identify the potential impacts on rural communities and other landowners. (Elected Official, Boise County, ID - #A4889.14000)

**BY ASKING LOCAL GOVERNMENTS TO PROVIDE THEIR PREFERRED MANAGEMENT PRESCRIPTIONS FOR NATIONAL FOREST SYSTEM LANDS WITHIN THEIR BORDERS**

Each incorporated village, town or city with a functioning government that has national forest lands within its borders should be asked to provide, through statute, its preferred management prescriptions should be binding on forest service managers in so far as they do not prevent national, state or county mandates from functioning.

Tribes, organizations and individuals should be asked to provide local knowledge, expertise, preferences and ideas to their state, county and local government as well as directly to national forest planners. (Individual, Ketchikan, AK - #A23219.13200)

**BY FOSTERING ADEQUATE DIALOG BETWEEN FOREST SERVICE MANAGERS AND LOCAL GOVERNMENT OFFICIALS**

Seeking the input of local governments and its citizens adjacent to the national forests as to the best means of protecting the surrounding environs is a critical responsibility of the Federal Government. Last year we witnessed in New Mexico how a well-intended effort to eliminate hazardous material in a national forest had a devastating impact on the lives of many citizens who lost their homes to uncontrolled forest fires. Better dialog between forest service managers and local government officials might avert such a disastrous policy. (Organization, Huntsville, AL - #A13542.15111)

**370. Public Concern: The Forest Service should recognize that revisiting the Roadless Area Conservation Rule ignores collaboration that has already occurred at the local level.**

We spent years negotiating and crafting this policy. We debated and compromised with the environmental organizations and the operators of sawmills, local loggers, paid representatives from the big extraction industries, and committed citizens such as myself. I do not want our hard work ignored and thrown out by a new administration. We have worked too hard and too long to be treated like children. We deserve respect. We earned it through many hours of hard work, research, and discussion. (Individual, No Address - #A12834.10150)

**371. Public Concern: The Forest Service should create policies and teams to work with state and local authorities in putting into place “right to manage” laws.**

**TO PROTECT THE FOREST SERVICE FROM LITIGATION**

Policies and teams should be created to work with state and local authorities to put in place similar “right-to-manage” laws and ordinances to effectively protect the Forest Service (and all public land management agencies) from litigious fools who expect life to be a bed of roses from which the government has removed all the thorns. Unfortunately, just as right-to-farm laws do not protect farm owners from the carelessness or indifference of neighbors “living the country lifestyle” who allow pets to harass livestock, who vandalize crops and machinery, who destroy crops through inappropriate or unattended burning of trash and yard debris, and who damage crops through careless or improper use of pesticides, right-to-manage laws will not protect forests from their neighbors. (Individual, Dallas, OR - #A3697.70110)

**372. Public Concern: The Forest Service should have an agency representative attend community meetings.**

[Question 2] Making sure that the Forest Service is present at community meetings and activities, council meetings such as the Great Falls Conservation Council. But always remember that you represent the nation at large and the future. (Individual, No Address - #A17946.14200)

*Collaboration with Agencies*

**373. Public Concern: The Forest Service should collaborate with the U.S. Fish and Wildlife Department.**

Requirements to consult with Fish and Wildlife Personnel and to monitor species need to be maintained, and the importance of scientific input into important Forest Service decisions can't be overestimated. (Individual, Decatur, GA - #A19228.12312)

**IN FOREST PLANNING**

Every year each department has a new management plan on how to manage wildlife and for the life of me I can not understand why wildlife departments and forestry departments can't work together towards a plan that each knows about and jointly oversee the projects within our public forests. As the current system exists it is the animals that suffer every time the plan changes, which in my point of view is way too often. Make up a good plan and stick to it. (Individual, No Address - #A771.15141)

Those who have the knowledge of these areas should be responsible for forest planning. Groups to put forward input should be the forest service, fish and wildlife and ecology departments. (Individual, Olympia, WA - #A286.15100)

**IN MANAGING ROADLESS AREAS**

Forest Service with help from fish and game should protect roadless areas (they may have to restructure some debts, etc). Keep congress and big business out of it, they are part of the problem. (Individual, Bozeman, MT - #A665.12120)

**374. Public Concern: The Forest Service should explain its relationship with the U.S. Fish and Wildlife Department.**

We had hoped that President Bush's Administration would restore the Forest Service to its historic work, which benefited all of the people living in and working on Federal lands. Now we understand that the Forest Service now has to work in submission to the National Fisheries and Wildlife Service.

When will citizens (human beings) be considered in all this morass? (Individual, Boise, ID - #A2541.12200)

**375. Public Concern: The Forest Service should collaborate with other agencies in managing roadless areas.**

Though wildfire is a unique phenomenon—can we not try to make interagency cooperation a given in preserving the contiguity of roadless areas (for existing values and ones that may not yet be even clearly formulated) in the same spirit we all come together to fight a fire? (Individual, Craig, AK - #A778.12310)

The forest service should work with all agencies—the Interior Department, the Corps of Engineers, the BLM, and the US Park Service—to coordinate efforts and protection wherever possible. It should invite all parties (government, private and public) to create workable common goals. It should do whatever is necessary to keep all parties involved along the way. (Individual, No Address - #A29275.15160)

## *Collaboration with Other Groups*

### **376. Public Concern: The Forest Service should ensure adequate collaboration with diverse groups.**

#### **BY EXPLAINING LAWS AND HOW THEY APPLY TO DECISIONMAKING**

The Forest Service can work with groups whose views and values are at odds by first explaining to them, and making their decisions based on, the laws as outlined in the National Forest Management Act and Multiple Use Sustained Yield Act, laws that mandate balanced management of all resources and preservation of biological diversity throughout the national forest system. If the U.S. Forest Service makes their decisions based on these acts of law and not due to political and local pressures of groups who usually have their own personal agenda, then there should be no difficulty in carrying out their responsibilities of managing our forest lands. (Individual, Port Angeles, WA - #A1044.20200)

#### **BY ARRANGING FACE-TO-FACE WORKING GROUPS OF ALL INTERESTS**

Arranging face-to-face working groups of all interests is the most effective way to develop a consensus. Working groups were used during the 1975 Unit Planning process on the White Mountain National Forest. Each group of 10-15 people represented the range of interest groups and met for 4-6 weeks to come up with joint recommendations on 30-40 issues. Working face to face produced much more civil and constructive results than other forms of public input. (Individual, No Address - #A17292.15000)

#### **BY BRINGING TOGETHER A CORE GROUP FROM VARIOUS INTEREST GROUPS TO DRAFT SOLUTIONS**

The best way to work together on this ruling is to go through the NEPA process and form a core group from the various interest groups that will attempt to draft solutions and guidelines for accomplishing them. (Business or Association, Princeton, ID - #A27994.20203)

### **377. Public Concern: The Forest Service should create a Board of Trustees.**

#### **TO OVERSEE MANAGEMENT DECISIONS, MONITOR ENFORCEMENT, AND ENSURE ADHERENCE TO WELL-BALANCED PRINCIPLES**

Create a Board of Trustees that would oversee the writing of Forest Service regulations, monitor enforcement, and review decisions made by Forest Service executives to ensure continuing adherence to well-balanced principles devoted to the public interest. Such a board should consist of representatives of all interested groups including us taxpaying owners of these public lands. (Individual, Loveland, CO - #A9080.15162)

### **378. Public Concern: The Forest Service should create partnerships that are inclusive of all economic levels.**

Much of past FS direction has been to favor commodity driven consumptive interests such as grazing, timbering, to some degree mining, and agricultural water systems. In more recent times the FS has formed quasi-partnerships with various recreational interests such as back-packing, horse-packing, helicopter supported activities, snowmobiling, ORVing, and Ski Industry activities. The clientele served by these partnerships are generally from the middle and upper incomes. The FS should form a partnership that would be more inclusive for all economic levels. (Individual, Salt Lake City, UT - #A19068.15120)

### **379. Public Concern: The Forest Service should respect the role of the Continental Divide Trail Alliance.**

It is our hope, that regardless of the decision over the Roadless Area Conservation Rule that the Forest Service and other land management agencies will respect the unique and critical role that the CDNST plays in our public lands. (Organization, No Address - #A30183.12120)

**380. Public Concern: The Forest Service should employ advisory committees.**

During the process, issues may surface that warrant an advisory committee to recommend an alternative to the interdisciplinary team, but we see no reason to superimpose such as advisory process as a matter of policy. Nor do we see the need to provide concerned parties with “special” accommodations outside the purview of the participating public. If advisory committees are employed to review the concern, the committee should be composed of individuals representing regional and national interests as well as those representing local interests. (Organization, Damascus, VA - #A17723.15110)

**RESOURCE ADVISORY COMMITTEES**

The NVWF [Nevada Wildlife Federation] stands ready to meet with the USFS at a local level and we would find people to sit on a RAC should you start one. We have members on every BLM RAC at this time. (Organization, Reno, NV - #A8730.12300)

USFS needs to bring all locals to the table. In Nevada, USFS has a seat at the table on the BLM RAC and that is great. USFS could even start their own resource advisement committee (RAC). (Organization, Reno, NV - #A8730.12300)

**381. Public Concern: The Forest Service should accept the cooperative behavior between special interest groups as evidence of collaboration.**

I feel that we have already proved that we are able to work together on access to the mountains. We formed a club called the Central Utah Multiple Use Club. We have directors from every avenue. We address hikers, bikers, truckers, ranchers, cabin owners and many others. I also belong to a three-county Access Management group. We openly discuss all issues. Why should the comments you receive be the only collective proof of collaboration? (Individual, Las Vegas, NV - #A26123.15160)

**382. Public Concern: The Forest Service should collaborate with the Mono Collaborative Planning Team.**

The Roadless Conservation Rule is a significant policy decision warranting the collaborative process of 64 FR 54074. As our comments of July 2000 emphasized, tribal governments, and local, regional, state and federal agencies in the Eastern Sierra have formed Collaborative Planning Teams (CPT) to facilitate such collaborative processes. The Mono CPT includes both the Toiyabe and Inyo National Forests. Included in the Memorandum of Understanding establishing our Collaborative Planning Team are directives to collaborate in responding to planning efforts such as the proposed rule that have the potential to affect or direct actions of our member agencies. We request that our collaborative team be given an opportunity for genuine participation in a collaborative process to clarify the rule. The upcoming update of the Toiyabe and Inyo forest plans could provide the appropriate collaborative format for local roadless policy clarification. (Elected Official, Mono County, CA - #A18107.12310)

**Education****383. Public Concern: The Forest Service should educate the public about specific topics.****ABOUT THE IMPORTANCE OF MANAGING PUBLIC LANDS FOR THE GREATEST GOOD FOR THE GREATEST NUMBER OVER THE LONG TERM**

In local areas, such as this county, that are dominated by federal lands and in which federal subsidies have historically been significant, I would like to see the Forest Service offer informational hearings and educational outreach activities to inform citizens about the importance of managing public lands for the greatest good for the greatest number over the long term. (Individual, Portola, CA - #A695.14120)

**ABOUT THE FACTS AND BENEFITS OF THE ROADLESS AREA CONSERVATION RULE**

In order for the agency to achieve the goal it set out to accomplish it is imperative to inform the public at large of the actual facts. Currently it appears that neither the public nor the communities most closely

affected are familiar with the details of the proposal. The impression exists that these rules will pose restrictions on vast land areas when in fact only 2-3% of the total land base of the U.S. are in question.

I would like to add (based on personal experience), that once people are properly informed about the issue, strong support for protection efforts can be expected. Unfortunately, the Forest Service has neglected public information and education on this important subject—including this public comment process—which in turn might explain a 30 year long evaluation process without little progress to show for.

I therefore urge the agency to do the utmost to properly inform the public and to proceed in the effort to protect National Forests. (Individual, No Address - #A26840.14000)

The service should work to educate the rest of the public, including persons opposed to the Roadless Rule, as to the benefits of the rule. (Individual, Dallas, TX - #A18002.15163)

The USDA and Forest Service should put the Roadless Areas Conservation Rule into effect right away, as it is a valuable policy that protects the national interest. The FS should also proceed with programs of public information to dispel misleading rumors and fears that have been spread by opponents of the rule. I have seen these scare campaigns in the past in the West, and I know this is just another one of the same. (Individual, Baltimore, MD - #A2321.10111)

#### **ABOUT RESOURCE MANAGEMENT NEEDS**

At the present time USFS requires, and taxpayers pay for, highly trained natural resource specialists for USFS field positions. But we let the Sierra Club and other special-interests environmental groups make resource management decisions by their influence over public opinion through their sophisticated media campaigns. The Forest Service needs to do a better job of educating the public about resource management needs. Resource management decisions must be made by Forest Service professionals who consider the benefits to the resource and the general public, not by environmental groups seeking to further their own self-interest agenda. (Individual, Walden, CO - #A20726.15163)

The Forest Service should focus on communicating and explaining the long-term social, economic and environmental benefits to local communities of maintaining roadless areas. (Individual, Deridder, LA - #A28678.15163)

### **384. Public Concern: The Forest Service should consider adopting the “Wood is Good” campaign.**

#### **TO CHANGE THE WAY PEOPLE VIEW WOOD-BASED PRODUCTS**

There is currently a “Wood is Good” campaign underway, being sponsored by a number of private companies, with the goal of changing the way people (with emphasis on young people) view wood based products and the way they are extracted and processed. This is the sort of program that the Forest Service could hitch its wagon to and begin to help change the way people view this greatest of natural resources. (Individual, No Address - #A16378.15163)

### **385. Public Concern: The Forest Service should educate the public with new materials.**

#### **BY PUBLISHING INFORMATIVE ARTICLES**

Publish Informative articles for educating and informing the local citizens. Send information to citizens on the mailing lists. (Individual, Mount Ida, AR - #A8739.14120)

#### **BY PRODUCING A TELEVISION PROGRAM REGARDING ROADLESS AREAS**

Evaluation by the public is best done through articles in newspapers throughout the US. The Forest Service could produce a TV show on National Roadless Forests for public TV. Communities adjacent to National Forests, particularly tribes could have public comment sessions set up by the Forest Service

personnel with a 2 page questionnaire sheet for participants to fill out. (Individual, Boulder, CO - #A3478.15152)

#### **BY DEVELOPING A SEMINAR FOR NEW USERS AND MONITORING ALL USERS**

Since I feel that these areas are of such grand value to us, I feel that we (the public) should be granted access to these lands; but since I feel that their value lies in their 'untouchedness', I feel it is important to regulate this access strictly. Certainly, it isn't possible to police all of these areas all of the time, but I feel it is important that any party that wants to make use of these lands (either for recreational or educational uses) must be adequately informed and responsible. I feel that first time users should be given a short seminar on how to use the lands responsibly and that their equipment be inspected for the first two or three times which they make use of the lands. Not at all to make sure that their packs are properly tied or anything, but simply to make sure that they don't take in anything which could harm the forest. Additionally, I feel that everyone who uses the forest should have to check in before and after they enjoy the forest. The inspections I've mentioned could well be random, but they are simply to ensure that nothing untoward gets taken into the forest, nothing improper gets removed and that everything that the campers, hikers, etc. take into the woods also comes back out and isn't left to litter the hopefully pristine area. (Individual, Cambridge, MA - #A11912.90000)

### **386. Public Concern: The Forest Service should educate the public.**

#### **RATHER THAN CLOSING MORE LAND**

We need to educate people to help maintain and enjoy what we now have, not shut off more land in a failing effort to save something that if left alone and not maintained will burn up and be of no use to anyone or anything. (Individual, No Address - #A1053.14120)

## ***Volunteerism***

### **387. Public Concern: The Forest Service should encourage volunteerism.**

All National Forests and Parks should look to San Bernardino National Forest and its Adopt-a-Trail program for ideas on obtaining community assistance in forest maintenance and management. The SBNF utilizes the OHV community to perform a variety of maintenance tasks in order to keep the forest routes open to all visitors. By using the Adopt-A-Trail program, volunteers from the community can do the work of several rangers. The OHV community would be an enthusiastic supporter of forest route maintenance activities if they were asked. We recognize that we are a small fraction of the visitors, yet the routes we like to travel take an inordinate amount of effort on the part of the Forest Service or Park Service staff. Through our volunteering, we can keep the remote routes open to all that wish to visit and keep the manpower and real costs associated with that maintenance to a minimum. (Individual, Murrieta, CA - #A367.17140)

I believe volunteer help in situations where manpower is limited is one option. If people feel strongly enough about an issue, they should be willing to pitch in and help out. (Individual, No Address - #A455.17140)

I should also like to make note of the many contributions ORV users have made to the clean up and maintenance of our public lands. ORV users, under the guise of organized ORV clubs, have organized clean-up and maintenance runs and spent countless man-hours cleaning up and maintaining trailsides, campsites, and hard to reach areas that are otherwise left to the ranger and cleanup crews. No other group of users has come forward in this manner and in these numbers to assist in protecting the natural environment. (Individual, Saint Louis, MO - #A629.17140)

I have been an active volunteer in the Roanoke Appalachian Trail Club for over 25 years and am well acquainted with the use of and need for more protected forests and wilderness areas due to increasing



recreational use. Please don't waste all the volunteer efforts that have gone into our preserving our forest lands. (Individual, Roanoke, VA - #A4738.10111)

#### **TO CUT MAINTENANCE COSTS**

Might it be worth looking at volunteer users of the forest resource to help maintain or repair roads, etc. so that uses can continue instead of being shut down or restricted due lack of manpower or funds within your agency? (Individual, Rock Springs, WY - #A22428.17140)

#### **FROM USER GROUPS**

If a kind of human use of an inventoried roadless area is proposed, the "user group" should be enlisted to study the use impact on several currently "roaded" areas. The users could be encouraged to provide resources and volunteer labor to assist the Forest Service. Obviously, the Forest Service needs assistance and additional resources if it does not have a budget of sufficient size to enable it to maintain the existing roads in the national forests. (Individual, Cottonwood, AZ - #A26396.17140)

#### **FROM TROUBLED YOUTH, HUNTERS, AND ANGLERS**

We have 50 states; all have wildlife hunters and anglers. Assign each state a sector to manage, use the troubled youth that is sent off to reform schools or prison to maintain roads, manage the habitat—while RE-BUILDING THEIR LIVES, and make them into productive citizens.

ALL AMERICAN HUNTING and ANGLERS WOULD VOLUNTEER TIME TO MAKE THIS PROGRAM WORK. (Individual, Athens, GA - #A11212.17140)

#### **FROM RETIREES**

Accept retirees as custodians of all wildlife into all United States Forest Services. Place them in pairs for security. Issue what equipment that may be needed. The retiree may prefer to use his own equipment. I for one would volunteer. (Individual, Gatesville, TX - #A11152.17140)

## **American Indian Rights and Interests**

**Note on American Indian Rights and Interests and the Organization of this Section** – The United States Government has a unique legal relationship with Native American and Alaskan Native tribal governments that have been established by treaties, statutes, and court decisions. Agency activities and decisions are implemented in a knowledgeable, sensitive manner respecting tribal sovereignty and operating within a government-to-government relationship with federally recognized tribal governments following consultations which consider the rights, concerns, and potential impacts of federal government plans, projects, programs, and activities which may affect tribal governments and communities.

Similar to American Indians in other parts of the United States, Alaska Natives claim aboriginal rights, a trust relationship, and inherent governmental powers. Alaska Native tribes federally recognized by executive order are eligible for services, have the same governmental status as federally recognized American Indian tribes in the lower 48, and are entitled to the same protection and immunity privileges. These tribes have the right, subject to general principles of federal Indian law, to exercise the same inherent and delegated authorities available to other tribes and are subject to the same limitations imposed by law. In addition, Alaska Natives and Corporations have statutory rights that allow them to exercise their rights on portions of the Tongass and Chugach National Forests.

Because of the unique status of American Indian tribes and the government-to-government relation that exists between them and the U.S. Government, special care has been taken to review comments from tribes and tribal interests separately from comments of other respondents who discuss tribal interests. Accordingly, this section includes two subsections: Comments of

American Indian Tribes/Tribal Interests, and Comments from Other Respondents Regarding American Indian Tribal Interests. It should be noted that this distinction is based on how respondents identify themselves or their organization in their letters. It is possible that among comments attributed to other respondents are comments actually made by tribal members or tribal interests, but if so that is not determinable from the letters.

## Summary

**Comments of American Indian Tribes/Tribal Interests** – One tribal representative urges the Forest Service to conduct meaningful consultation with American Indians regarding roadless area management. A tribal corporation requests that the Forest Service reevaluate its working relationship with such corporations, since federal regulations grant them the same legal status as tribes.

Some assert that the Forest Service should manage public lands for traditional tribal uses in accordance with treaties. To that end, one tribal representative states that the Forest Service should consider treaty rights during roadless area evaluations and requests these rights are not violated in the name of collaboration or conflicting objectives with other outside groups. Some tribal representatives who address treaty rights urge the Forest Service to adopt the Roadless Area Conservation Rule in order to protect and restore treaty resources including, some point out specifically, anadromous fish populations. Representatives also ask that the Rule be implemented in order to protect American Indian cultural practices and to protect American Indian sacred sites.

One tribal corporation requests that the Tongass National Forest be permanently excluded from any national roadless rule in recognition of treaty obligations to tribal corporations in Alaska. This corporation states that “the special trust relationship enjoyed by Natives includes recognizing Native corporations in a manner that assists in fostering their success,” and concludes that, in lieu of relevant statutory direction, the Forest Service should conduct no further roadless area reviews and evaluations on the Tongass NF.

**Comments from other Respondents regarding American Indian Tribal Interests** – Several individuals urge the Forest Service to give high priority to American Indian concerns when formulating a national roadless rule. One person states that American Indian tribes should be consulted on their gathering needs and traditional knowledge of the natural processes in and for adjacent roadless wilderness areas. They also need to be consulted on new areas to be designated roadless wilderness and their rights respected. Another individual asserts that the Agency should clearly distinguish between tribal rights and other special interests, stating that to combine the two together would be wrong and disrespectful to the Tribes. Some ask the Forest Service to assist tribes in protecting their tribal lands from outside commercial interests. An Alaska resident requests that the Forest Service recognize the environmental impacts of gerrymandered timber-rich land grant allocations to tribal corporations, as well as corporate accounting practices which favor liquidation of tribal corporation forest resources at a loss for tax purposes.

Some assert that federal land management should be delegated to American Indians due to their proven record of caring wisely for the land. Others stress that American Indians should be allowed access to roadless areas to continue traditional activities and cultural practices. A number of these respondents state that the Roadless Area Conservation Rule will not hinder this, and therefore it should be adopted in order to protect archeological and cultural sites from degradation or inadvertent destruction. Several respondents from Southeast Alaska describe the

importance of subsistence hunting and fishing, and state that the Rule should be applied to the Tongass National Forest immediately in order to prevent further degradation of these resources due to timber harvest and roadbuilding (see also Chapter 5: Designating Areas (Question 8): Inclusion/Exclusion of Specific Areas from a National Roadless Rule: *Inclusion*). Another individual requests that more sustainable forestry practices be adopted in the Pacific Northwest, where traditional weaving is threatened by commercial over-harvest and lack of sufficient old-growth cedar and other species to provide materials.

One respondent states that tribal governments should not adopt a similar roadless policy for reservation forests because it will have a negative economic impact on American Indians.

### ***Comments of American Indian Tribes/Tribal Interests***

#### **388. Public Concern: The Forest Service should conduct meaningful consultation with American Indians regarding roadless area management.**

Consistent with its trust responsibility, the Forest Service must conduct meaningful government-to-government consultation with tribes. This means sending appropriate officials with decision making authority to consult with the Tribe on issues surrounding development of any roadless area strategy and developing mutually satisfactory proposals. The Nez Perce Tribe expects such consultation to occur with Forest Service officials with decision-making authority over the ultimate decision for roadless protection. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

#### **389. Public Concern: The Forest Service should reevaluate its relationship with tribal corporations.**

Under the provisions of numerous CFRs, Sealaska, Native village and Native urban corporations have the same status as tribes. The Forest Service must review its position regarding how it interrelates with these special status corporations. (Tribal Corporation, Seattle, WA - #A20468.85100)

#### **390. Public Concern: The Forest Service should manage public lands for traditional tribal uses in accordance with treaties.**

##### **BY CONSIDERING TREATY RIGHTS DURING ROADLESS AREA EVALUATIONS**

The Forest Service is obligated to abide by Indian treaties, comply with state and federal water quality standards, and to protect fish and wildlife. It is not obligated to log. With respect to tribal treaty rights, the federal trust obligation requires that the Forest Service take actions to protect cultural resources and ensure harvestable levels of fish, wildlife, and plant resources to ensure meaningful exercise of treaty rights. The Forest Service must therefore consider the area's characteristics relative to its obligations during roadless area evaluation. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.20000)

##### **BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

It is critical that the Forest Service consider and honor its treaty and trust obligations to tribes in evaluating and implementing any roadless area strategy. This means that the Forest Service must take actions necessary for the protection of cultural resources and the protection and enhancement of harvestable levels of fish, wildlife, and plant resources necessary for the meaningful exercise of treaty-reserved rights. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

How can the Forest Service work effectively with individual and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the agency cannot meet all of the desires of all of the parties?

The Forest Service must take actions that are consistent with its statutory and treaty obligations. This means taking actions necessary to protect endangered species, protecting clean water, and protecting

greatly reserved resources. The Forest Service must develop proposals necessary to meet these obligations and then, and appropriate, solicit public comment and conduct appropriate and meaningful government-to-government consultations with tribes. (Chairperson, Tribal Government, Lapwai, ID - #A11821.85100)

### **391. Public Concern: The Forest Service should not abdicate tribal treaty rights in order to foster harmony between competing interests.**

During the new round of comment the Forest Service must remain cognizant of the federal trust responsibilities associated with tribal treaty rights. The Forest Service does not have the authority to abdicate treaty guaranteed rights. Tribal treaty rights cannot be ignored or allowed to erode for the purposes of fostering harmony between groups with conflicting objectives. Treaty rights to fish and hunt require that protection of fish and wildlife be placed on a higher level than maintenance of a timber supply to a local mill or provision of off-road vehicle trails for recreation. A useful analogy would be to think of Indian tribes with treaty rights to take fish (a property right) as being akin to miners with patents on federal lands. The Forest Service does not manage mining on the basis of local “collaboration” processes, but instead on the basis of rights secured by the Mining Law of 1872. If the Forest Service were to treat Indian tribes with that same measure of legal force which it addresses the Mining Law of 1872 and the rights of miners, it is likely that fish and wildlife populations on federal lands would be in much better condition. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.85311)

### **392. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule.**

#### **TO FOSTER TREATY RESOURCE PROTECTION**

Many treaty resources have declined in abundance, most notably anadromous fish species, and roadless areas play an important role in the protection, conservation, and potential recovery of these species. Roadless areas contain and support important aquatic habitat, protection of which is essential to the continued existence of the species. Timber harvest, road building, and other ‘development’ in these areas would cause sedimentation, temperature increases, fragmentation in habitat, and other adverse effects for aquatic habitats both within the roadless area as well as downstream from it. This in turn contributes to the decline of both listed and unlisted species. It is for such reasons that the Commission’s salmon restoration plan, (*Wy-Kan-Ush-Mi Wa-Kish-Wit, Spirit of the Salmon*) the Columbia River Anadromous Fish Restoration Plan of the Nez Perce, Umatilla, Warm Springs, and Yakama Tribes (CRITFC, 1995) calls for cessation of logging, mining, and road construction in all roadless areas of 1,000 acres or greater. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.85200)

#### **TO PROMOTE TRIBAL SALMON RECOVERY EFFORTS**

The roadless areas of National Forests within the Tribe’s treaty territory are central to both tribal and federal efforts to recover imperiled species. For example, in its recent salmon recovery plan for Columbia River basin salmon and steelhead, the Forest Service and other resource agencies state, “For tributary habitats on federal land, the federal land managers will protect existing high quality habitat and accelerate restoration in high priority subbasin,”

The Nez Perce Tribe carefully weighs and balances all the costs and benefits of natural resources management and protection to the recreational, cultural, religious, subsistence, economic, and commercial utilization of National Forests by its members. Tribal members are employed by the timber industry and can be affected by decisions to implement or endorse nature resources management strategies. On June 14, 2000, after a careful review and consideration of the proposed roadless area protection, including consultation with appropriate Forest Service representatives, the Nez Perce Tribe endorsed the previously developed Roadless Area Conservation Rules as a plan consistent with both the federal government’s treaty and trust obligations and the Tribe’s own salmon recovery efforts. A copy of these comments is attached.

The Tribe continues to support the system of roadless area protection developed by the Forest Service. (Tribal Government, Lapwai, ID - #A11821.85000)

**TO PROTECT AMERICAN INDIAN CULTURAL PRACTICES**

I am writing to express the concerns of the Leech Lake Reservation over attempts to diminish or repeal the gains made toward the implementation of the Roadless Conservation Rule. As I am sure you are aware, the Leech Lake Reservation and the Chippewa National Forest overlap, so we have first-hand knowledge of how excessive road building can affect the resources of an area and, in our case, the traditional activities of tribal members. (Tribal Government, Cass Lake, MN - #A31097.85311)

**TO PROTECT AMERICAN INDIAN SACRED SITES**

Many of these sacred sites are as spiritually important to Native Americans as the Sistine Chapel and the Wailing Wall are to others. Bulldozing a road directly through Arlington National Cemetery would cause public outrage, however sites as sacred and significant to Native Americans continue to be destroyed within Forest Service Lands. Building roads into the pristine wilderness environments will preclude religious use for many tribes. Noise, environmental degradation, and competition from increased recreational use would also effectively prevent continuation of tribal religious practices.

Native Americans have already lost so much of our culture and tradition. It is high time that the First Nations of this area are granted the same freedom of religion enjoyed by most Americans today. We urge you to keep native American Sacred Sites in the forefront of any decision-making regarding roadless areas. (Tribal Association, Arcata, CA - #A17205.80120)

**393. Public Concern: The Forest Service should exclude the Tongass National Forest from a national roadless rule.****TO FULFILL OBLIGATIONS OF THE UNITED STATES' TRUST RELATIONSHIP WITH AMERICAN INDIANS**

The Tongass NF must be administered in a manner that is much more sensitive to Indian law, which recognizes ANCSA corporations as being tribal, ANCSA, and ANILCA. The special trust relationship enjoyed by Natives includes recognizing Native corporations in a manner that assists in fostering their success. Per USDA Departmental Regulation No. 1340-006; Subject: Policies on American Natives, dated October 16, 1992; Policies, b. states "Consistent with applicable law, USDA officials will consult with tribal governments and ANCs (Alaska Native Corporations) regarding the influence of USDA activities on water, land, forest, air, and other natural resources of tribal governments and ANCS." And c." . . . Consistent with applicable law, USDA officials will solicit input from tribal governments and ANCs on USDA policies and issues affecting tribes and will seek to reconcile Indian and Alaska Native needs with the principles of good resource management and multiple use."

Section 708 of ANILCA, when combined with Section 1326 of ANILCA, can only be read to direct the Forest Service to conduct no further roadless area reviews and evaluations on the Tongass NF. (Tribal Corporation, Seattle, WA - #A20468.20200)

***Comments from Other Respondents Regarding American Indian Tribal Interests*****394. Public Concern: The Forest Service should give high priority to American Indian concerns when formulating a national roadless rule.**

The Native American tribes tend to have values in line with the ones here expressed, and I expect that the inevitable differences of emphasis will not be so great that they cannot be resolved by straightforward negotiation. They have seniority on the land, treaty agreements supporting their interests, and a respectful attitude toward natural life and the land. Their opinions should be taken seriously. (Individual, Dallas, OR - #A3697.85110)

The concerns of Native Americans should receive high priority because they were the earliest inhabitants and, in many cases, their land was essentially taken from them. The spiritual values of early Native Americans include respect for natural settings and wildlife that other Americans would be wise to adopt. (Individual, Gallatin Gateway, MT - #A19100.85340)

**395. Public Concern: The Forest Service should conduct meaningful consultation with American Indians regarding roadless area management.**

I want Native American tribes and their elders consulted on their gathering needs and traditional knowledge of the natural processes in and for adjacent roadless wilderness areas. They also need to be consulted on new areas to be designated roadless wilderness and their rights respected. This is very important and may help us re-introduce fire into the ecology again. (Individual, Talent, OR - #A23553.85300)

**396. Public Concern: The Forest Service should clearly distinguish between tribal rights and other special interests.**

Distinguish between the rights of Native Americans and 4-wheeler clubs: the first are sovereign states, the latter are recreationists, and to muddle them together as “interest groups” is an astonishing affront. Tribes should have rights on a par with the Federal agencies who own the adjoining lands. (Individual, Bozeman, MT - #A27070.85300)

**397. Public Concern: The Forest Service should protect American Indian lands from commercial exploitation.**

The Forest Service should in all cases protect the rights of Native American groups to secure protection of their lands from commercial exploitation by outside groups. (Individual, New Haven, CT - #A616.85000)

**398. Public Concern: The Forest Service should acknowledge the environmental consequences of the tribal corporation land grant selection process.**

It is important to point out that during the land grant selection process by the newly formed Native Corporations, the property boundaries were manipulated to take in the most valuable timber stands, leaving the less valuable stands and barren land to public ownership. This was the epitome of gerrymandering, and has now resulted in vast areas of “cut-over” adjacent to and throughout National Forest Lands. (Individual, Sitka, AK - #A1056.85320)

**399. Public Concern: The Forest Service should review native corporation and institutional logging contracts in southeast Alaska.**

It should be pointed out that Shee Atica Native Corporation of Sitka has recently signed a contract with ITT Rayonier to liquidate the remaining timber on their Katlian River Watershed land grant near Sitka. Their plan is to generate net operating loss to reduce their corporate tax obligations. It can be expected that Mental Health Trust and University of Alaska land grants which comprise the remainder of productive timberlands in the Katlian watershed, will be added to Rayonier’s logging contract. (Individual, Sitka, AK - #A1056.85320)

**400. Public Concern: American Indians should be allowed to manage public lands.**

Tribes have suffered enough, and should have predominant say in the management of their lands. (Individual, Colorado Springs, CO - #A17259.15000)

**BECAUSE OF THEIR PROVEN RECORD OF CARING WISELY FOR THE LAND**

Regarding management of all public lands as well as fish and game! This job should have long ago been given to the people with the best resume as well as the people with the longest running and proven record of care for the land, and fish and game for thousands of years before we got here! (The American natives managed very well to the land and as far as I have been able to find out, never causing any kind of fish, animal or bird to become extinct!) The Forest Service, BLM and Fish and Game have tried, failed and next will restrict us more and more. This is not the answer! Every American native was born and raised to respect the land and everything on, above or below it! They provided us a very beautiful place to conquer, unmarked, unscathed. And look what we have done to it! It’s a simple matter of

educating the hordes of people from the cities prior to visiting our beautiful public lands. Teaching them to respect what they are about to experience when they get here-at a young age! I have seen deer taken, never gutted even though they were shot days before, hauled south for proof, pictures and discarded, never eaten! These people do not care-no one asked them or told them to respect the land they are about to visit or anything that might be there, or why! The job of educating the people as well as controlling public lands, fish and wildlife could be done no better than by Native Americans! (Individual, Hot Springs, MT - #A966.70000)

#### **401. Public Concern: The Forest Service should allow American Indians to practice traditional religious and cultural activities in roadless areas.**

Native American religious and cultural observances are also an appropriate use of roadless areas and could be used discretely to help us white, black, Latino, and Asian and Polynesian folk get in touch with our own ancestries and the spirit of the land and inner/outer god(desses) that is within all if us and surrounds us. (Individual, Watsonville, CA - #A6767.70000)

Activities by Native Tribes should be held to a different standard than those of the dominant Anglo culture. It is regrettable that some tribes may choose to manage their lands intensively for commodities, but that is their choice. I do not personally see the connection between roadless areas of public lands, and tribal land management concerns, but if there are conflicts, special consideration should be given to the Native Tribes, especially regarding preservation of their traditional life ways. (Individual, Corvallis, OR - #A650.85300)

Allow access to native peoples to practice religious observances on a non-continuous basis. (Individual, Atlanta, GA - #A873.85312)

Exceptions should be made for tribes. Tribes should have virtually unrestricted access to federal lands adjacent to their adjacent to their properties when such access is for the purpose of exercising traditional rites. (Individual, Olympia, WA - #A10330.85300)

USFS representatives must recognize the importance of maintaining traditional and historic cultural activities impacted by restricting access to or expanding roadless areas, such as preservation of Native American cemeteries and burial grounds, traditional activities such as pine nut harvesting, hunting and fishing, rock hunting, Christmas tree cutting and firewood cutting. (Elected Official, Alpine County, CA - #A8597.85330)

#### **402. Public Concern: The Forest Service should implement a national roadless rule.**

##### **TO PROTECT AMERICAN INDIAN CULTURAL PRACTICES**

[Roadless areas] preserve areas needed for traditional Native American religious and cultural observances. (Elected Official, State of New Hampshire - #A4536.85300)

Without intact forests, the cultures of Native Americans are threatened and will become extinct. This would be a terrible loss for all Americans. (Individual, Inver Grove Heights, MN - #A260.85310)

The FS has already identified IRAS, through extensive public input under the aegis of RACR. It is quite simply time to implement them. since the matter is under litigation, the least that FS could do in the interim is protect with due diligence the following values:

Native cultural values—These IRAS should preserve and protect the traditional religious and cultural ceremonies of the people of the First Nations, the Native Americans. To embark on a new road building program, like the one proposed for the Gravina Island in Tongass, would adversely impact the traditional way of life that the Tlingit and the Haida pursue. (Organization, Seattle, WA - #A11782.85310)

Native peoples need their sacred sites and wild areas for ceremonies and other activities, and it is hard to tune into the Great Spirit when you keep getting reminded and irritated about how reckless human “management” of the landscape is in most roaded areas. (Individual, Los Angeles, CA - #A17161.85311)

#### **TO HELP PROTECT AMERICAN INDIAN SACRED SITES**

Extremely important: protect the sacred lands of the various tribes so that they can maintain their cultural heritage. I find it hard to understand why Mt. Rushmore cannot be climbed, but Devil’s Tower is wide open to public destruction. Such unequal rulings diminish the Forest Services’ and Park Services’ credibility. (Individual, Lopez Island, WA - #A15240.85311)

### **403. Public Concern: The Forest Service should ensure subsistence needs are met for southeast Alaska rural communities.**

#### **BY MAINTAINING WILDLIFE AND FISH POPULATIONS**

In addition to wage employment, traditional gathering of subsistence foods plays a substantial role in Southeast Alaska’s rural communities. Since time immemorial, subsistence has been a way of life and culture for Alaska Natives. Non-Native immigrants to the region have also learned to rely on harvest of wild game and fish. Eighty five percent of the rural households in Southeast Alaska harvest some kind of subsistence food and nearly one-third of rural households supply half their need for fish and meat by hunting and fishing. Subsistence may provide 70 to 80 percent of the protein consumed in less accessible households in the Gulf of Alaska region. Reductions in wildlife and fish populations threaten the foundation of Native culture and the classic Alaskan tradition of living off the land. (Organization, Nevada City, CA - #A4941.85210)

I would like to mention the perspective of Merle Hawkins, a leader in the native community of Metlakatla near Ketchikan. Merle is the one who taught me some of the secrets of subsistence gathering on Gravina Island. She, like many others, depends on the harvest of subsistence foods such as salmon, berries, deer, beach asparagus and other edibles in the intertidal zone. She has lived here her whole life, studied her history, and tried to pass it on. She feels very strongly that Gravina Island should be protected and that the local planning process, and EISs in developing this particular sale, are flawed and fail to represent the true impacts to the native culture and community. She says, “if you don’t like wild forests and this way of life, move somewhere else.” (Organization, Bloomington, IN - #A28110.85200)

#### **BY ALLOWING AMERICAN INDIAN TRIBES TO HUNT IN NATIONAL FORESTS**

Indian tribes who hunt in these forests may be allowed to do so. But no roads should be built to facilitate this hunting. No roads should be built for any reason whatsoever. (Individual, Anchorage, AK - #A518.85312)

### **404. Public Concern: Tribal governments should not adopt a similar roadless policy for reservation forests.**

#### **BECAUSE IT WILL HAVE A NEGATIVE ECONOMIC IMPACT ON AMERICAN INDIANS**

With regard to Tribal roads, a roadless policy inside a reservation forest would have a negative economic impact. Tribal forests are utilized for timbering and recreation. These activities generate millions of dollars of revenue which support programs for Native Americans. (Elected Official, Gila County, AZ - #A3013.85320)

### **405. Public Concern: The Forest Service should support a more sustainable timber industry.**

#### **TO PRESERVE TRADITIONAL NORTHWEST WEAVING**

I make my living practicing traditional Northwest weaving, using the native materials of Western Red Cedar, Yellow Cedar, Yew, and Birch. These resources have been diminishing at a rapid rate through



years of logging practices, which have not taken into consideration all the economic values of maintaining forest ecosystems.

When I am no longer allowed to gather from public land, and private land clearing is no longer an option because the slow growing cedar trees have not been replanted, I will stop practicing my profession as a traditional weaver rather than be a part of the further loss of the old growth forests on public land.  
(Individual, Indianola, WA - #A25409.65290)

## Competing Values/Limited Resources (*Question 9*)

**Question 9: Competing Values and Limited Resources.** How can the Forest Service work effectively with individuals and groups with strongly competing views, values, and beliefs in evaluating and managing public lands and resources, recognizing that the Agency cannot meet all of the desires of all of the parties?

This section includes one subsection: Managing Competing Interests.

### Managing Competing Interests

#### Summary

**General Comments** – Managing competing interests is a topic of comment to a number of respondents. Some suggest that before the Forest Service can manage competing interests, it must first clarify its purpose and mission; others say that it must first restore public trust. Additional suggestions include complying with current and applicable laws and legislation; understanding political, management and leadership issues; ensuring a fair and open process; using scientific studies; evaluating relative impacts of competing uses; considering who is most affected by the decision; and ignoring extreme viewpoints. Aside from suggestions for how to manage competing interests, some state that consensus is an unrealistic goal and that it must be acknowledged that some parties will not be satisfied with management decisions.

**Administrative/Agency Guidance** – Some respondents assert that the Forest Service can best manage competing interests by taking a more proactive role in making decisions. One respondent states that it is “crucial” that the Agency remains the lead on decisionmaking and forest management issues and is worried that other agencies will unduly influence the process and decisions. These respondents assert that the Forest Service is a professional agency, that its purpose is to manage federal lands, and that it should take responsibility for decisionmaking. Likewise, some state that the Forest Service should allow trained foresters to make decisions rather than relying on public comment.

**Local Forest Planning Process** – A number of respondents assert that the local forest planning process provides the best way to work with different groups. They believe that there are so many different viewpoints in the nation, that maybe at the local level is where the Agency will be able consensus. Writers state that local decisionmaking is also more effective in managing competing interests because issues relating to specific areas can be discussed and there is more knowledge of ecological conditions.

**Enhanced Collaborative Efforts** – Some suggest that competing interests can be managed effectively through enhanced collaborative efforts. People suggest this can be achieved by making every effort to meet everyone’s needs, using conflict resolution strategies, using professional negotiators, or by forming advisory planning groups. Others suggest that the Forest Service should collaborate with special interest groups, although some state that special interest

groups won't compromise without an incentive to do so. In general, however, many assert that the fairest way of resolving differences among groups is through compromise. (See also Chapter 3: Working Together (Question 2): Public Involvement in Decisionmaking: *Collaboration Processes, Collaboration with States and Local Governments, Collaboration with Agencies, and Collaboration with Other Groups.*)

**Public Education/Information Efforts** – Several respondents advise using public education to resolve conflicts. This may be attempted through forest rangers, seminar programs, or by establishing a department of information. Some comment that it seems like the Forest Service's only way to address a problem is by closing access to the forest and suggests education to mitigate problems instead.

**Forest Service Staff Training/Education** – Some suggest that management of competing interests requires proper Forest Service staff education and training. Respondents suggest that Forest Service employees should be unbiased, should be able to work with a diverse constituency, and should understand political, management, and leadership issues. Others suggest the Forest Service should employ a diverse staff by hiring conservation biologists, naturalists, and people from all backgrounds.

**Will of the Public/Elected Representatives** – Many respondents assert that the Forest Service can best manage competing interests by abiding by the wishes of the majority. These people state that National Forest System lands are owned by the majority and therefore the "Forest Service should give weight to the overall opinions of all Americans" rather than just the presidential administration, private interests, or special interest groups (see also Chapter 1: National Roadless Protection – General Remarks: Need for the Roadless Area Conservation Rule: *Implement the Roadless Area Conservation Rule* and Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*). However, some state that conflicts can best be resolved by allowing elected officials to make decisions, because in a republican form of government it is elected officials who represent the public.

**Ecosystem or Preservation Values** – Some suggest that the best way to resolve competing interests is to place the highest value on ecosystem preservation. One individual remarks that the Forest Service should be a steward of the forest and an advocate for wild lands, before trying to resolve diverse opinion. Some assert that the destruction of a roadless area is irreversible but the preservation of a roadless area is not, and therefore the Forest Service should "err on the side of caution" by holding preservation as the highest priority when seeking to resolve conflicts.

### *Managing Competing Interests General*

#### **406. Public Concern: The Forest Service should clarify its purpose and mission in order to manage competing interests.**

Clearly define purpose and goals. If all interests can be met within the guidelines, great, if not at least all parties will be aware of the constraints. The forest service should not have to satisfy private interests. The forest service should only work to protect the public resource and maintain the current roadless wilderness areas. There is enough development. (Individual, Beverly Hills, MI - #A4756.15161)

##### **BY APPOINTING A COMMISSION TO ADDRESS THE ISSUE**

At the local level the Forest Service can bring the competing values and desires together. It takes dedication, time and perseverance but it seems to be the only way consensus can be reached.

It would be beneficial to have a National consensus regarding the overall mission and purpose for the National Forest System. This is real fuzzy now. A good start was made with the points of agreement from the 7<sup>th</sup> Forest Congress but there was very little follow-up. Maybe there could be a blue-ribbon commission appointed to address this issue. (Individual, Salt Lake City, UT - #A22628.15160)

#### **BY DEVELOPING A MISSION STATEMENT**

The roadless plan should be scrapped. It is time to put the stench of the last administration behind us. The forest service needs to develop a mission statement that all people can live, especially those most affected by agency decisions. It needs to stop pandering to the environmental community. (Individual, Emmett, ID - #A110.10130)

[Question 9] It would be beneficial to have a National consensus regarding the overall mission and purpose for the National Forest System. This is real fuzzy now. A good start was made with the points of agreement from the 7th Forest Congress but there was very little follow-up. Maybe there could be a blue-ribbon commission appointed to address this issue. (Organization, Wenatchee, WA - #A22628.15160)

### **407. Public Concern: The Forest Service should restore the trust of the public before attempting to manage competing interests.**

Be open and honest with the public. The travesty that was the previous public meetings regarding this issue was downright insulting. The members of the public who attend deserve to be treated with at least some modicum of respect that has been sorely lacking from the agency in recent years, at least above the individual districts. I believe the agency will have a monumental task simply restoring the confidence and trust of the public before there is any hope of effective compromise between competing interests. (Individual, Los Alamos, NM - #A3720.15110)

First and foremost, be open and honest with the public. The travesty that was the previous public meetings regarding this issue was downright insulting. The members of the public who attend deserve to be treated with at least some modicum of respect that has been sorely lacking from the agency in recent years, at least above the individual districts. I believe the agency will have a monumental task simply restoring the confidence and trust of the public before there is any hope of effective compromise between competing interests. (Individual, Denver, Co - #A5433.12230)

### **408. Public Concern: The Forest Service should manage competing interests.**

#### **BY IMPLEMENTING THE ROADLESS AREA CONSERVATION RULE**

On the website you asked how to deal with competing values and limited resources - the policy enacted on January 12, 2001 deals with this problem in the best way possible. It created the idea of compromise—in 51% of the forests, logging, drilling, and mining will continue to be allowed, while it will be prevented in the remaining 49%. Even here, some leeway is provided, as all contracts already in effect in those areas may be seen through to the end. A more balanced compromise could not be asked for. It is time for people to learn to live within their means and to limit their demands on the environment.

For these reasons I urge you to let the rule stand as it is written in the January Record of Decision. It is an admirable move to protect our national forest roadless areas—without loopholes, waivers, or additional exceptions. Once these forests are gone, they're gone forever, and with them goes an important source of the human spirit. (Individual, Riverside, CA - #A4971.10150)

#### **BY COMPLYING WITH CURRENT LEGISLATION, USING THE BEST AVAILABLE INFORMATION, ENCOURAGING LOCAL INPUT, AND PROVIDING SUFFICIENT STAFF**

There will never be consensus on the management of national forests. Therefore, the Forest Service must anticipate dealing with conflicting values. If the Forest Service bases the forest planning and decision making process on the following elements, there will be a higher likelihood of acceptance and successful implementation.

Compliance with current legislation including the National Forest Management Act, use accurate site-specific information, seek and encourage local community involvement, authorize and support local decision making, use the best available science as a foundation for any analytical review and resulting recommendations, provide sufficient staff and other resources so that local forest plans can be successfully implemented. (Business or Association, Boise, ID - #A17232.13000)

#### **BY COMPLYING WITH ALL APPLICABLE LAWS**

As previously mentioned, the Forest Service is mandated to follow the NFMA, NEPA, as well as the ESA, APA, CWA, as well as other established federal laws. If the Forest Service would obey the law, many of the problems of “competing views” would be solved. (Organization, Salt Lake City, UT - #A17170.20200)

#### **BY IDENTIFYING WHAT IS REQUIRED BY LAW AND WHAT IS DISCRETIONARY**

The Forest Service must act consistently with its statutory and treaty obligations. The Service must first act to protect endangered species, clean water, and treaty reserved resources. The Service cannot back out of these obligations or create compromises for the purposes of reducing political pressure. Thus, an important step that the Forest Service could take to deal with many of its competing interests is to identify what is required by law and what is discretionary. This will narrow debates, protect property rights, and clarify whether a remedy can be had via Forest Service policy change or whether it must be through changes in state or federal law. (Columbia River Inter-Tribal Fish Commission, Portland, OR - #A20331.20000)

#### **BY COMPLYING WITH THE NATIONAL FOREST MANAGEMENT ACT**

*Competing Values and Limited Resources:* There will likely never be full agreement between all the parties interested in the national forests. With a lack of political consensus to change the statutory mission of the national forests, the Forest Service must adhere to the current body of legislation, most importantly to the National Forest Management Act. (Business or Association, Rockville, MD - #A13306.15160)

#### **BY COMPLYING WITH THE NATIONAL ENVIRONMENTAL POLICY ACT**

The Forest Service has a proven tool for working with the public to make sure that all views are heard—NEPA. It is true that the Forest Service cannot ever meet all the desires of all interested parties but the Forest Service can ensure an open process, build an adequate record for decisions and provide reasoned explanations to avoid or minimize conflicts and litigation. In addition, even if it makes some groups unhappy, the Forest Service must be sure to work within the current statutory framework. However, consistent with legal and regulatory constraints, are opportunities for consensus building. Constructive dialogues at the Forest level of community involvement can help bridge differences and narrow the range of disagreement through mutual education. This is a proven approach, but the USFS must encourage line officers to engage in such processes, as many avoid it due to the intensity of the issue and staff resources that must be committed. (Business or Association, Spokane, WA - #A17351.15161)

#### **BY PREPARING ENVIRONMENTAL ANALYSES IN CONFORMANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT**

The best way to work with the variety of interests concerned with management of inventoried roadless areas is through the procedural regulations suggested in Question 1 . . . . The Forest Service can best work with a variety of interests by preparing environmental analyses in conformance with NEPA. (Individual, Long Beach, CA - #A25664.20203)

#### **BY CONSIDERING THE RESULTS OF THE UNITED STATES INSTITUTE FOR ENVIRONMENTAL CONFLICT RESOLUTION**

Results of the United States Institute for Environmental Conflict Resolution, NEPA Pilot Projects [FR Doc. 01-11898-Filed 5-10-01] might be useful [in resolving competing interests] if all else fails. Many participants attending a meeting concerning the above on June 8, 2001 in Denver, Colorado considered litigation the surest and least expensive way to put their point of view on the table of competing values.

If the Forest Service would have an independent constitutional overview of their new planning process, some of the competing social views would be minimized. (Individual, Rock Springs, WY - #A15658.15152)

**BY CONSULTING THE VOLUMES OF LITERATURE IT HAS PUBLISHED IN RESPONSE TO PUBLIC CONCERNS**

This is far too broad a question to be answered in one rulemaking process, but I would advise the Forest Service to look at the immense volumes of literature that it has published on the subject in response to concerns the public has raised. (Individual, Logan, UT - #A939.15150)

**BY ADEQUATELY UNDERSTANDING POLITICAL, MANAGEMENT, AND LEADERSHIP ISSUES AND PUTTING ASIDE ITS OWN SELF-INTERESTS**

The Forest Service must better understand political, management, and leadership issues of working “effectively with individuals and groups with strongly competing views, values and beliefs.” There is little evidence that that agency has given much thought to these complexities, hence most agency engagement tends away from collaboration and engagement and toward older forms of command and control behavior—often thinly camouflaged with language hinting at collaboration and positive interaction in search of public interest. The Forest Service must also put aside its own vested self-interest if it is to have any chance at working effectively with all parties. (Individual, Corvallis, OR - #A8027.15162)

**BY RECOGNIZING ITS OWN VESTED INTERESTS**

The agency must first begin by recognizing its own vested interests in certain kinds of organizational systems, management structures, and management methods. The agency is not a neutral arbiter amongst competing interests, but rather, has its own interests that are too often allied with private industrial users at the expense of all other citizens, interests and values. To date, despite glowing rhetoric about the need for greater collaboration and partnerships in planning and decision-making, the agency’s actions betray a continued interest in asserting technocratic power and control over the land and people. The RACR is not the proper venue for managers to relearn how to “care for the land and serve people.” The problems of Forest Service management extend far beyond the roadless area issue. We recommend that as a first step all Forest Service employees should read Dr. Paul Hirt’s excellent critique of Forest Service management, “A Conspiracy of Optimism.” (Organization, Eugene, OR - #A30352.15100)

**BY USING SCIENTIFIC STUDIES**

[Question 9] Get representatives of the competing views in a single room with USFS management and design a specific study that will prove or disprove the contentious issue. The Canadian Lynx is a good example here in Colorado. Environmentalists said the snowmobile tracks would harm the Lynx reintroduction by allowing a competing animal, the coyote, to walk on top of the hardened snow track and out-compete the Lynx. There was no scientific basis for this view but yet many snowmobile trails were closed. Over time the assumption was found not to be true but the trails are still closed. (Individual, Palmer Lake, CO - #A23361.14500)

**BY FOLLOWING THE EXAMPLE OF THE QUINCY LIBRARY GROUP**

The Quincy Library Group is one example of how diverse groups and competing interests can work together. (Permit Holder, Boise, ID - #A29589.15160)

**BY USING THE ADAPTIVE ENVIRONMENTAL MANAGEMENT PROCESS**

The Forest Service would do well to evaluate use of the Adaptive Environmental Management process. Now used by the BLM in the Pinedale Anticline Natural Gas Project in southwest Wyoming, AEM brings all user groups to the table, and allows local participants to construct management plans that specifically address local issues. The result is a plan that all participants can accept. Compromise, while not completely satisfactory to everyone, is at least a viable solution that everyone has a hand in. AEM has the added benefit of helping to prevent litigation and a lengthy and costly decision-making process. (Individual, Pinedale, WY - #A26289.15162)

**BY USING AN EARTH GOVERNING SOCIAL SYSTEM**

An Earth Governing Social System . . . would facilitate collaborative analysis, planning and coordination of activities effecting Earth systems. Such a system may be used on varying scales, from local communities to global ones. (Individual, Curtain Act, Australia - #A29708.15162)

**BY ENSURING A FAIR AND OPEN PROCESS**

The Forest Service must provide an open and fair process for the competing views, values and beliefs to be aired. The Forest Service cannot, as it did with the pending Roadless Actions, impose a preordained outcome on the decisions that it must make. The only way for the competing interests to be fully and fairly assessed is to ensure that local management remains paramount. While the Forest Service cannot meet all desires of all of the parties, it can ensure that the process that it uses is fair and open. (State Agency, Cheyenne, WY - #A22608.15160)

**BY PRESENTING BOTH SIDES OF THE ISSUE IN A BALANCED, HONEST, AND FAIR MANNER**

The last roadless effort had a very pronounced propaganda campaign pushing its roadless agenda, to the point of almost lying about the real situation, at least refusing to release any critical facts that didn't prove the absolute need to protect every last scrap of roadless ground in the US. I definitely agree that some areas need to be set aside, but there needs to be a balance. Without presenting both sides of the issue in an honest and fair manner, you're not going to get folks with differing viewpoints to agree on how to manage these areas. You will also not get a true picture of how the American public wants to see these areas managed if they don't understand the true issues and ramifications on both sides of the fence. (Individual, Wrangell, AK - #A30478.10135)

**BY APPLYING ITS POLICIES TO ALL INTERESTS CONSISTENTLY**

I am also a motorcyclist but stand in firm opposition to the motorcycle industry's supposedly representative voicing of what they present as unilateral rider desire that these protective laws be neutered. Despite this press to the contrary, I believe that most of us agree that there is need for strong protection. I, and many like-minded others, will gladly surrender the privilege to ride in or otherwise use protected areas in order to avert any risk to these resources, but ONLY if the law holds true for all—big business interests included. (Individual, South Bend, IN - #A1226.15120)

A policy that is inconsistent leads to a lack of National precedence, creating a policy with no teeth. Also it allows for too much influence from powerful lobbying organizations. Who exactly will have the "forest-to-forest" decision making ability? There is plenty of open land available to destroy with these operations. (Individual, Las Vegas, NV - #A1239.15120)

**BY BALANCING COMPETING VALUES**

Competing values and limited resources. As I have repeatedly suggested . . . the USFS should look at the system as a whole and come up with a comprehensive landscape-scale management plan that balances extractive and wilderness values. We already have over 400,000 miles of roads in the system to provide for extractive uses, and roaded lands constitute the majority of land cover. Protecting remaining roadless habitats merely lends balance (and barely, at that!) to the system as a whole by providing for both extractive/motorized and non extractive/non-motorized forest values. (Individual, Davis, CA - #A30523.15162)

The Forest Service needs to be a balancing practitioner of uses within the forest. One forest activity should not prevail over another, and in most situations not everyone is going to be satisfied with a particular decision that the Forest Service makes.

In the Tongass National Forest it is a fact that the logging industry takes precedence over other forest activities. Citizens of Wrangell, a Southeast Alaska town that lies within the Tongass National Forest, and others concerned would like to see more recreational opportunities available to them and prospective tourists. Bike trails, skiing, cabins, shelters, campgrounds and interpretive and educational opportunities are just some of the activities that could be pursued instead of logging. (Union, No Address - #A17699.15168)

### **BY CULTIVATING RELATIONSHIPS WITH ALL DIFFERENT INTEREST GROUPS**

The Forest Service also needs to cultivate cordial and permanent relationships with more than the livestock, hunting, timber and mining interests. It needs to spend just as much time with environmental organizations, urbanites, backpackers, birdwatchers, tree huggers, and women. You don't develop an understanding of all segments of society if you don't communicate with all segments of society on an equal basis. (Individual, Waterbury, VT - #A15433.15164)

### **BY CONSIDERING WHO IS MOST AFFECTED BY THE DECISION**

In regard to dealing with competing values on the subject of public lands management, the forest service should look at who the decision affects the most. A greater consideration, regardless of the numbers, should be given to local residents, governments and communities when making a decision that affects public lands and resources. A very minimal consideration should be given to the view of those who do not live in the area affected, regardless of the number of comments. (Individual, Manti, UT - #A25532.15111)

### **BY MAKING LAND USE DECISIONS BASED ON THE RELATIVE VALUE OF DIFFERENT USES TO SOCIETY**

Each competing use must be evaluated for its contributions to society and the local economy. The natural resources of each area ultimately will generally dictate the "highest and best use", i.e. forest product production, mineral production, grazing, recreation (both developed and undeveloped), etc. Look for the highest and best benefit to society as a whole—not just the selfish demands of a small vocal minority. NEPA, ESA, CEA, etc. will dictate limits of uses and protect the environment. These NF lands and natural resources must help support the demands of our growing society. Everything we depend upon must be derived from the earth. If it can't be grown—it must be mined. (Individual, Tucson, AZ - #A5625.15160)

Although competing interests for National Forest resources have intensified in recent years, there have always been competing interests in the use and management of the National Forests. In the Secretary of Agriculture's February 1, 1905 letter to the Forester (first Chief of the Forest Service), Secretary James Wilson outlines the general policy laid down for the Forest Service "in the administration of the forest reserves". This extraordinary letter has stood the test of time—particularly the closing phrase: "where conflicting interests must be reconciled the question will always be decided from the standpoint of the greatest good of the greatest number in the long run."

The United States is very fortunate in having an organization like the U.S. Forest Service; with its historic delegated authorities to manage the National Forests for the greatest good for the greatest number in the long run. Although numerous statutes have been passed to deal with more intensified and competing uses, Forest Service personnel, political appointees and competing forest users would benefit by reconciling conflicting interests and reaching consensus "from the standpoint of the greatest good of the greatest number in the long run." (Business, Juneau, AK - #A5440.15160)

The agency of course cannot "meet all of the desires of all parties" on all acres of a National Forest. The key is to identify the highest values and appropriate uses on all forest areas. In many instances, this requires segregating uses. There currently is an overabundance of roaded national forest landscape, to the detriment of other values. Currently unroaded areas can best be managed by retaining that roadless condition and emphasizing the variety of values associated with roadlessness. (Individual, West Glacier, MT - #A5946.15160)

### **BY EVALUATING THE RELATIVE IMPACTS OF COMPETING USES**

It also is important to consider the impact of any use. Will use A by 10 people compromise the use of the forest by 100? Will use B by 100 compromise only the use of 10 people? Clearly the second scenario is preferable. (Individual, Seattle, WA - #A17999.15168)

### **BY TAKING A LONG TERM VIEW**

[Question #9] Always take a long term view. Kill the goose today no eggs later. (Individual, Ellijay, GA - #A8020.15000)



The Forest Service should take the longest view possible. Forget about the current stakeholders and think of the next generation. Most Forest Service land is open to resource extraction. Practically all private land is open to resource extraction. Globally, the pressure to extract resources from natural areas mounts daily. Natural ecosystems are being lost and changed in ways that we don't yet understand. Clearly, a hundred years from now a protected natural area will be of more value than another tree farm.

The Forest Service should maintain a long term view in its dealings with people with differing viewpoints, and should request that participants in these discussions maintain a long term view. (Individual, Portland, OR - #A13436.50300)

#### **BY CONSIDERING EACH ROADLESS AREA FOR ITS CONTRIBUTION TO A LARGER CAUSE**

If you consider each roadless area for its potential contribution to a larger cause, I believe you can get people enthused about how best to combine and group the IRAs into something more meaningful. With this technique you will illustrate how a National Forest is stratified into two separate categories of land: that which will be used for the production of goods and services (more intensively managed) and that which will be managed for more intangible benefits (less intensively managed).

When the Forests complete their roadless reevaluation, I believe three types of land arrangements will become apparent. They are: (1) roadless lands which are widely dispersed; (2) roadless lands which are more closely grouped; and (3) some combination of both of these situations.

When a Forest has a widely dispersed IRA situation, it is destined to manage its roadless "islands" as "protectorates." It can highlight these few areas for their uniqueness and their contrast to the rest of the Forest (which is already dedicated to goods and services) and celebrate that they took charge in the "nick of time" to save what was left.

When a Forest has the IRAs in close proximity or groups, it can manage for a larger inter-connectedness. A line can be drawn around the outside boundary of the grouped IRAs within which a less intensive form of land management could occur. . . . This can be used to contrast with the remainder of the Forest that is more visibly dedicated to the production of goods and services (more intensive management).

I believe this approach would give both industry and the environmentalists the feeling that they have determined something useful and meaningful. They would be providing something visible for their causes plus resolving the current gridlock for future generations. They would, in fact, be delineating the portion(s) of the Forest that will be managed to produce the intangible benefits such as roadless, etc., while also defining the portion(s) of the Forest that will produce the goods and services. (Individual, Libby, MT - #A2301.15120)

#### **BY MAKING A DISTINCTION BETWEEN ROADED AND ROADLESS AREA VALUES.**

The USFS can easily and effectively manage competitive values, views and beliefs by distinguishing between the values and goals of NF roaded and roadless lands. Roaded lands are where development activities based on roads like intensive resource management, and motorized use should occur. Roadless lands area where low development, dispersed resource extraction like livestock grazing could occur. Roadless lands are where non-motorized recreation should be given priority. (Individual, Bozeman, MT - #A8818.15160)

#### **BY DISCOUNTING THE COMMENTS OF EXCLUSIONARY GROUPS**

In specific response to the question about conflicting uses, I propose any one group who proposes/supports the exclusion of any other person/group/activity be discounted and not given credit for comments. These folks/groups never learned the sharing rule/lesson in Kindergarten and don't have standing to comment.

While this may seem lighthearted I'm serious. Those who propose exclusion are not good citizens, but rather selfish and narrow minded. These are Public lands and as such are "for" the public to benefit from and use. Responsible multiple use policies are the proper direction to go. Thus, only those who are willing to share have a valid voice in this discussion. (Individual, No Address - #A21170.15110)

#### **BY IGNORING EXTREME VIEWPOINTS**

All sides must share information freely. Those with viewpoints at the extremes should be politely ignored. There is room only in the middle for resolution to these issues. (Individual, Hayden, ID - #A30279.15160)

#### **BY INCREASING DIRECT CONTACT BETWEEN REGIONS AND THE WASHINGTON OFFICE**

The role of the Regions would be greatly reduced by more efficient use of computers, more direct contact between the Washington Office and the (fewer) Forests and the increased authority of the Ranger Districts.

These changes would make the Forest Service more responsive to the social, political, economic and technical factors at work in policy development. They would increase the Forest Service's "doing" ability. They would strengthen the balance between national and local needs and desires and have a chance to promote harmony rather than acrimony.

Region One has been one of the most contentious areas in the country in dealing with roadless and Wilderness allocation. Please consider trying this approach to organization and planning in Region One and see if it helps get resolution to the roadless issues. (Individual, No Address - #A26264.15160)

#### **BEFORE ENGAGING THE PUBLIC**

The Forest Service should work harder at the beginning by developing a mission, and goals. If you stay within this mission to accomplish the goals, then you have done what needs to be done on the public's behalf. Remember that the most vocal people represent a small minority of the "public". Most people don't have time to go to meetings and read hundreds of pages of Federal Registers unless it directly affects them or their property. (Individual, Miami, FL - #A1110.12120)

#### **409. Public Concern: The Forest Service should not attempt to change the beliefs of citizens.**

There will always be individuals and groups with strongly competing views, values and beliefs in evaluating and managing our public lands and resources. The USFS will not, and should not attempt to change these strongly held beliefs. Even if they did, it wouldn't work. (Individual, Grangeville, ID - #A830.15163)

#### **410. Public Concern: The Forest Service should recognize that the Roadless Area Conservation Rule has magnified conflict between groups.**

##### **Damage to Forest Service public relations**

Obviously, the Roadless Area Initiative is very controversial, both inside and outside the Forest Service. **It has greatly magnified the conflict between the urban environmental community and other National Forest users.** The battle lines are drawn. On one side is the Administration and every environmental organization; on the other, every rural state and its governor, every county board, hunters, ORVers, libertarians, and logging and mining associations. (Union, No Address - #A13245.15120)

#### **411. Public Concern: The Forest Service should recognize that consensus is an unrealistic goal.**

You will rarely find all sides agreeing on some middle-ground compromise; consensus is an unrealistic goal. As one environmental organization representative put it recently, "If I don't win I'll lose my job." People whose jobs depend on winning cannot be expected to reach any accommodations with the other side of an issue. (Organization, Cocolalla, ID - #A13511.15120)

#### **412. Public Concern: The Forest Service should recognize that not all parties will be satisfied with management decisions.**

All that can be done is to listen carefully to what they are saying and try to ascertain their reasons for their views. Their views are not wrong. We have to acknowledge that there will be some dissatisfied people and some who will be very happy over the same decisions. (Individual, Olympia, WA - #A278.15110)

Working effectively with individuals and groups with strongly competing views is difficult. I do not believe that organized development and preservation groups represent the silent majority. Intense public involvement with local service organizations might educate these people and vocalize the silent

majority. Integrating public input, both local and national, with capability of the land in an honest and forthright manner during the planning process is the best way to do this. If everyone is a little unhappy and the land does not suffer you probably have it right. (Individual, Dayton, WY - #A5074.15110)

**413. Public Concern: The Forest Service should recognize that most competing values arise from radical groups.**

Most of the “competing values” arise when you get unbending radical groups on one side and virtually everyone else on the other. Remember, there is no compromise when you are dealing with these groups. When was the last time you heard an environmental group offer to “give” anything except less of what they want and don’t have? Any time anyone else is asked to compromise, they have to give something such as access to their favorite area or another 5 acres of what they used to have access to. (Organization, Richfield, UT - #A20428.15121)

*Administrative/Agency Guidance*

**414. Public Concern: The Forest Service should implement the desires of the current President.**

What is the best way for the Forest Service to work with the variety of States, tribes, local communities, other organizations, and individuals in a collaborative manner to ensure that concerns about roadless values are heard and addressed through a fair and open process?

The best way to be fair is to let the leader elected by 280 million Americans decide. Whatever Bush would like is the will of the American people. (Individual, Silver Spring, MD - #A4593.15165)

**415. Public Concern: The Forest Service should take a leadership role and finalize its decision.**

The Forest Service needs to take a strong leadership position in managing forests and natural resources and be willing to make decisions, knowing that their decisions will almost always be unpopular with one or more interests. The agency has, in recent years, stepped back from its leadership role and attempted to be a convener or facilitator, often unwilling to make decisions where groups with competing views are simply unable to reach consensus. (Permit Holder, Denver, CO - #A15385.15160)

Follow a good process involving all parties, examine all options, listen to the public, make a good decision, and stick to it. The Forest Service has done all but the last. (Organization, Seattle, WA - #A21694.15160)

The inventory of the roadless area has taken over a decade and cost the taxpayers millions of dollars. It is time that the rules are followed through and enforced. The forest service needs to stop asking questions on how they should function and start protecting our forests. All sides have been heard and now it is time for action. As a taxpaying voting citizen I am very frustrated with the amount of procrastination the roadless act has seen. Money should stop being wasted and work should start getting done. (Individual, Helena, MT - #A17696.15161)

From the ski industry’s perspective, it is crucial that the Forest Service function as leader and decisionmaker on forest management issues, whether it be at the planning or site-specific level. The agency has a statutory duty to manage forest resources to provide outdoor recreation opportunities to the public under NFMA and under the National Forest Ski Area Permit Act, and, moreover, brings recreation experience and expertise to the table. As other agencies, federal and state, get more involved and express more vocal opinions about management of forest resources, the need for leadership at the Forest Service becomes paramount. (Permit Holder, Denver, CO - #A15385.15162)

#### **416. Public Concern: The Forest Service should allow trained foresters to make decisions.**

The most important concern for “roadless” area management is to get the East vs West to make the determinations truly necessary to maintain our forests and wildlife. We can do this best by cutting the funding these environmentalists have tapped and end the ceaseless court cases. There are no roadless areas on the east coast . . . polls and press should not be managing our forests. Trained foresters are the ones we should be listening to. (Individual, Three Forks, MT - #A697.15100)

##### **RATHER THAN RELYING ON PUBLIC COMMENT**

The Forest Service’s decision-making process needs a substantial overhaul. There will always be disagreement about natural resource management. The current “consensus” system gives veto power to extremists, who want to prevent all management activities. The current system of public involvement has largely turned technical decisions over to laymen, who do not have adequate backgrounds to make these decision. We don’t actively seek public involvement in complex technical decisions, like how to treat cancer or how to design the space shuttle. Why would the public be any better at making complex technical decisions about how to manage National Forests? Setting long-term goals for forest conditions and management programs is an appropriate role for the public. The role of technical professionals in advising the public regarding resource potential, management alternatives, and management effects and in determining how best to achieve long-term, public goals for the National Forest needs to be strengthened. (Individual, Bend, OR - #A702.15110)

The USFS is charged with managing our federal lands as professionals and is paid to do so, despite its trend towards shaking off responsibility and putting it on the shoulders of the “public.” Thank God the Military does not do this or other large federal agencies. Do your jobs and manage the lands as defined. If they are considered suitable for multiple use management, then do so and stop trying to find ways to take them out of production. Put all lands considered as roadless into the Wilderness system and lock it up. Reduce your staffs and concentrate on those lands the public has said can be managed and saved. You cannot waste time trying to appease all the public. It’s impossible. You are still land managers, not arbitrators. (Individual, Montrose, CO - #A370.15100)

#### **417. Public Concern: The Forest Service should comply with the law and use professional judgment.**

You should, honestly and with an open mind, listen to all of us, analyze our comments and act on our good ideas. You must comply with the letter and spirit of the law and make the best, unbiased and professional decision you can for the land, its resources and the American people. That’s why we pay for your professional services. We have an appeal process and courts to deal with our objections. (Organization, Boise, ID - #A17677.10131)

### ***Local Forest Planning Process***

#### **418. Public Concern: The Forest Service should recognize that the local forest planning process provides the best way to work with different groups.**

As in all instances involving limited resources and multiple channels of demand, there will never be a full agreement between all parties with an interest in the National Forest System. Therefore, CCA asserts that the USFS re-emphasize the local forest decision making process as the best possible means of achieving desired resource conditions. Furthermore, the solution to the problems inherent in the Roadless Area Conservation Rules lies in a healthy compromise between land use and environmental protection. The two can co-exist, with proper management and cooperation between the managing agencies and users of the land. (Business or Association, Sacramento, CA - #A3681.15160)

Sifting through competing values and limited resources is the price of living in a 21st Century democracy. When forest management issues are debated through national rulemaking, the ideology

becomes more important than consideration of actual landscapes. Consequently, more decision-making at local levels allows Forest Service employees to consider competing ideologies measured against actual effects on the ground. Local decision-making offers more opportunity for consensus where stakeholders can find management alternatives that do not necessarily compromise their beliefs. Therefore, forest management issues such as managing inventoried roadless areas should, for the most part, be considered at the local level. (Business or Association, Washington, DC - #A17887.13110)

There will likely never be full agreement between all the parties interested in the national forests. The Forest Service should re-emphasize local forest-level decision making as the best possible means of achieving desired resource conditions. (Business, Rapid City, SD - #A30145.15160)

There will never be full agreement between all the parties interested in the national forest. **The national forests are multiple use lands and with effort and professionalism can be managed as such.** The Forest service should reemphasize local forest-level decision-making as the best possible means of achieving desired resource conditions. In addition, the Agency and Congress should ensure that there are enough staff and resource **in the field** so that forest plans are implemented and objectives are achieved. (Individual, Moose, WY - #A20339.15162)

#### **BY ALLOWING COMPETING VALUES TO BE IDENTIFIED LOCALLY ON EACH FOREST**

Competing Values and Limited Resources. Competing values must be identified on each forest and must be locally determined. The KNF should be forest specific, not regionally specific, as would be the case of the consolidation of the Kootenai and the Panhandle. Once competing values are identified, they must be prioritized. Local input is invaluable in this process. (Elected Official, Lincoln County, MT - #A18119.13110)

#### **BY ESTABLISHING LOCAL BOARDS TO MAKE DECISIONS**

The problem is not with establishing federal policy that will please all but in establishing local boards with authority to make decisions after hearings and public input. Then when they are properly taught, educated, and informed by the citizens and foresters, those boards can make the decisions that will build and strengthen the local forests and preserve the forest for future generations, and for the continuation of quality watersheds, recreation, grazing, mining, and the environment. (Individual, Gunnison, UT - #A25755.15162)

#### **BECAUSE ISSUES RELATING TO SPECIFIC AREAS CAN BE DISCUSSED**

The best way for the Forest Service to work with the variety of entities on the roadless issue is through the forest planning process. This way specific issues relating to specific landmasses can be discussed. Discussion of roadless areas, statewide or nationwide allows only broad emotional issues to be discussed. Generally these issues are not related to specific needs of the land or the people. (Individual, Dayton, WY - #A5074.13000)

### ***Enhanced Collaborative Efforts***

#### **419. Public Concern: The Forest Service should manage conflicting interests.**

##### **BY EMPHASIZING COLLABORATION**

Collaborative efforts should be stressed. Individuals, organizations, and other affected parties must be able to discuss the management of local roadless areas through the existing forest planning process. . . . Collaborative solutions should be developed even in the absence of complete "consensus." (Organization, Lake Isabella, CA - #A20945.15162)

##### **BY MAKING EVERY EFFORT TO MEET EVERYONE'S NEEDS**

The service must make every effort to meet everyone's needs. Certainly, not everyone will agree with every decision but, if all concerns/interests are addressed and efforts made to accommodate those interests are made, then the service has done its job. (Individual, No Address - #A50.15162)

### **BY USING CONFLICT RESOLUTION STRATEGIES**

We recommend the use of conflict resolution strategies among stakeholders as one strategy to diminish conflicts. Persons used to resolve conflict should have the support of the affected parties before resolution strategies are employed.

Too often the agency accepts public comment in public meetings and allows for misinformation to build because inaccuracies are not corrected in public meetings. This passive approach allows the loudest and most prolific voices to prevail. After a period of public hearings and comment, if significant conflict remains, the agency should endeavor to resolve those conflicts through structured conflict resolution strategies among stakeholder representatives representing a balance of interests. (Permit Holder, Boise, ID - #A29589.15160)

The Forest Service should consider using arbitration or conflict resolution processes with representatives of diverse stakeholder groups, when appropriate, to resolve negotiable issues related to forest management. Also, lessons learned from local collaborative processes such as those being used with particular focuses/issues on the Nez Perce Forest in Region 1 should be examined for their levels of success. (Permit Holder, Boise, ID - #A29589.15162)

### **BY ESTABLISHING LOCAL MONITORING TEAMS COMPOSED OF DIVERSE STAKEHOLDERS DEDICATED TO SUSTAINING ROADLESS ECOSYSTEMS**

Management innovations such as Reinvention should be encouraged to establish local Monitoring Teams comprised of diverse stakeholders beholden to the purpose and principle for sustaining roadless ecosystems. By clarifying and upholding clear purpose and principles, the strongly competing views will be superseded by these national scale values for roadless areas. These interests can have their way with the vastly more numerous roaded areas, where more diverse prescriptions and experimentation are warranted. (Individual, Cleveland, OH - #A26411.15160)

### **BY USING PROFESSIONAL NEGOTIATORS, PUBLIC RELATIONS CONSULTANTS, AND CONFLICT RESOLUTION SPECIALISTS**

Employ professional negotiators, public relations consultants, and conflict resolvers. (Individual, Lolo, MT - #A111.15162)

To work with groups and people who want different things for/from the national forests (the key here being National, as in belonging to ALL citizens), the Forest Service should continue to educate the public on its goals and plans, and also should employ professional negotiators to work with groups of people EVERYDAY, not just when things come to a head. That encourages more communication, understanding, and learning across the entire community—even leading me on occasion to side with a lumber mill. (Individual, Bozeman, MT - #A285.15162)

### **BY FORMING ADVISORY PLANNING GROUPS**

One way to assure that viewpoints be heard and recognized would be to format a hierarchy of the advisory planning groups, so that a number of the groups would yield a regional recommendation. The format would have to provide for dissenting opinions, possibly legitimizing the minority opinion by the regional body agreeing that it is a minority opinion, otherwise there could be any number of minority opinions which would not be helpful. (Individual, No Address - #A781.15100)

Advisory groups. The composition of said groups must consist of “all” interested parties. Balance of interests is mandatory. These advisory groups, operating on each forest, must be assured that their input is meaningful and not just window dressing. (Elected Official, Iron County, MI - #A3612.15120)

Each NF should have a Resource Advisory Council (like BLM’s RACs) to advise the S.O. and District Rangers on controversial natural resource management issues. 15 people, 5 each from 3 groups (commodity interest/environmental/local govt.-tribe). (Individual, Tucson, AZ - #A5625.15152)

Given the current lack of a political consensus to change the statutory framework, the Forest Service must adhere to the planning process mandated by NFMA. The potential to use forest level advisory committees, as envisioned by NGMA, may offer further opportunities to develop local community based solutions. (Organization, Chantilly, VA - #A3350.13200)

**420. Public Concern: The Forest Service should collaborate with special interest groups.**

**BY MEETING WITH THEM INDIVIDUALLY AND COLLECTIVELY AND DEVELOPING AGENDA ITEMS EQUALLY IMPORTANT TO BOTH**

Local Foresters should meet individually and collectively with the different interest groups that they work with. Foresters should develop agenda items that they would review with each group both individually and collectively. The agendas for each group must be exactly the same and not be tilted towards one special interest group or the other. Following individual meetings, a collective meeting, sharing all of the data openly with each interest group is also imperative. Preordained decisions and preconceived plans should not be allowed in this process. (Business, Haslett, MI - #A4861.15000)

**BY DEALING WITH ONE REPRESENTATIVE FROM EACH INTEREST GROUP**

The Forest Service should work with all groups by dealing with one representative of each “view”—not mass meetings where people are paid and bussed in to support a point of view. People simply have to be willing to listen to each other and compromise. The Forest Service should expect nothing less and should make this very clear from the onset. Representatives who are out of line should be asked to step down and a new representative should be requested from a group. Treat this like a meeting of foreign countries rather than a town meeting—it is probably closer to the first. (Individual, Holtville, CA - #A8729.15162)

**421. Public Concern: The Forest Service should advise groups that the fairest way of resolving differences is through compromise.**

Convince groups that compromise is the only way of being as fair as possible, and the only way of preventing bitter land use issues from becoming the source of future regional or localized civil unrest. A recognition of when extreme views demand an undue price from either the resources or those who most depend on them. MOST OF THE PUBLIC HAS LITTLE RESPECT FOR EXTREMISTS! THAT GOES FOR ENVIRONEMTALISTS OR RAPE THE LANDISTS. (Individual, Brimley, MI - #A3659.15160)

Simple compromise should prevail. Public input and small workgroups or task forces of interested parties may be the best resource for helping Forestry make its ultimate decisions. (Individual, Nashville, TN - #A874.15162)

**422. Public Concern: The Forest Service should recognize that interest groups must have an incentive to compromise.**

All of the diverse interests must have an incentive to resolve their beliefs. The preservation groups have no incentive to resolve their beliefs with other groups because as long as there is no decision on the roadless issue they win and the areas remain roadless. These groups will compromise only when they recognize the need for compromise. Industrial interests have more incentive to compromise at the local level because they have much more at stake. Congressional direction to resolve the issue through forest planning at the local level with judicial decisions backing up that direction may be the only method to arrive at a solution. Otherwise, this 30-year conflict will likely be around for a lot longer. (Individual, Moscow, ID - #A5380.15160)

If individuals and groups with diverse interests do not have an incentive to work together in a cooperative atmosphere, there is little the Forest Service can do to force cooperation. The Forest Service should proceed with planning efforts as specified in legislation. Until Congress acts and the judicial

branch recognized the validity of forest planning, the issue will remain. (Business or Association, Moscow, ID - #A5428.15160)

## **Public Education/Information Efforts**

### **423. Public Concern: The Forest Service should use public education to resolve conflicts.**

Managing forests for differing values is solely a matter of EDUCATION. It just so happens we folks who live in Rural Areas already value the forests for ALL THOSE DIFFERING VALUES, and understand fully HOW 'WE (all American) CAN ALL HAVE OUR CAKE AND EAT IT!' Education is the only thing that will ensure that has an opportunity to happen. (Individual, Forks, WA - #A877.15163)

#### **THROUGH FOREST RANGERS**

Having 'Forest Rangers' in the areas to assist in education would not only be helpful to the visitor but would help restore respect for the Forest Service. (Individual, Jarbidge, NV - #A8842.15163)

#### **THROUGH CLASSROOMS AND SERVICE GROUPS**

Education in the class rooms (fun elementary stuff) as well as a teenage service group within the agency (a quasi-scouting group from local high schools) would be a big help in introducing ideas to the young about the reason for certain decisions. By showing an interest in the youth, adults have a tendency to soften their stance. (Individual, Springfield, OH - #A12726.15163)

#### **THROUGH SEMINAR PROGRAMS**

There has been a surge of seminar programs by both government (state and federal) and by the private industry. This seminar type education seems to me a good idea because it is a very quick way to get various groups together with very little expense. One well educated man or woman that is educated in many fields can put on a program that has three or four (or more) to a group that other agencies are also interested in. (Individual, Celina, TN - #A11902.15163)

#### **BY ESTABLISHING A DEPARTMENT OF INFORMATION**

The NFMA must develop and employ a policy of public education so that states, organizations, individuals, tribes, etc. are aware of the status of these areas. They must be educated so that they know the reasons for the protected status. If an extensive public relations campaign, or a department of information is required, it should be established. This department, however, should have no decision making powers, but rather be in place to disseminate information to the public, and to gather public opinion. (Individual, Santa Barbara, CA - #A504.15163)

#### **RATHER THAN CLOSING ACCESS TO FOREST LANDS**

The management philosophy of the Forest Service seems to be that the only way to address a problem is by closing access to the forest. An approach that is more reasonable to the public including motorized visitors is to maintain recreation opportunities by addressing a problem through mitigation measures such as education, signing, seasonal restrictions, user fees, and structural improvements such as water bars, trail re-routing, and bridges. We encourage public agencies to support and use education as a means to address and mitigate problems rather than closures. Most user created problems can be addressed by education. Education should be the first line of action and all education measures should be exhausted before pursuing any other action. The elimination of much needed recreational opportunities is not reasonable without first exhausting all possible means of education to address the problem. Educational programs could include use of mailings, handouts, improved travel plan mapping, pamphlets, TV and radio spots, web pages, newspaper articles, signing, presentations, information kiosks with mapping, and trail rangers. Restrictions or closures are not always obvious to the public. Education can also be in the form of measures such as the use of jackleg fences with signs at the end of motorized trails in sensitive areas so that public is made aware of the end of the motorized trail and the surrounding area closure. The use of public education to address problems may require effort and time but it is more reasonable than closures and must be used fully utilized. Additionally, motorized visitors



can be called upon to help implement the educational process. (Organization, Helena, MT - #A13226.15163)

**424. Public Concern: The Forest Service should inform the public that national forests are not national parks.**

The USFS needs to undertake an educational campaign to inform the public that the National Forests are not National Parks and come under the concept of multiple use. The point needs to be made that the USFS is part of the Department of Agriculture because timber is an agricultural commodity. Timber production and the complementary goal of watershed protection, are the main reasons for the existence of a Forest Service. (Q9) (Individual, Ruidoso, NM - #A17775.15163)

***Forest Service Staff Training/Education***

**425. Public Concern: The Forest Service should manage competing interests.**

**THROUGH THE USE OF SCIENCE AND UNBIASED EMPLOYEES**

The most effective way to work with competing interests is to let sound science be the guide to decision-making that is made through public involvement. Unbiased USFS employees need to be sought for management. There has been too many USFS employees making a name for themselves as environmentally friendly and capitalizing on their biased decisionmaking when leaving public service. It ruins the agency's credibility and ability to make sound and reasonable decisions based on facts and public input. Our own Carson City office is deemed the "Headquarters for the Wilderness Society" by much of the general public in Nevada. (Individual, Sun Valley, NV - #A30102.15160)

A number of USFS personnel I've come in contact with over the years are clearly biased and are even anti-specific use. The Forest Service needs to determine who these individuals are and get rid of them or at least demote them to a position where they can do no harm. (Individual, Fraser, CO - #A30203.15152)

**BY CONSULTING WITH PERSONNEL WHO HAVE WORKED UNDER THE NORTHWEST FOREST PLAN**

You should consult with agency personnel who have been working under the Northwest Forest Plan. They have a lot of experience in dealing with various interest groups, one avenue being the PAC. (Organization, Port Townsend, WA - #A21695.15162)

**BY HAVING ALL FOREST SERVICE EMPLOYEES READ "A CONSPIRACY OF OPTIMISM"**

The agency must first begin by recognizing its own vested interests in certain kinds of organizational systems, management structures, and management methods. The agency is not a neutral arbiter amongst competing interest, but rather, has its own interests that are too often allied with private industrial users at the expense of all other citizens, interests and values. To date, despite glowing rhetoric about the need for greater collaboration and partnerships in planning and decision-making, the agency's actions betray a continuous interest in asserting technocratic power and control over the land and people. The RACR is not the proper avenue for managers to relearn how to "care for the land and serve people." The problems of Forest Service management extend far beyond the roadless area issue. We recommend that as a first step all forest Service employees should read Dr. Paul Hirt's excellent critique of Forest service management, "A Conspiracy of Optimism." (Organization, Eugene, OR - #A21798.12230)

**426. Public Concern: The Forest Service should employ a diverse staff.**

**BY HAVING AS MANY CONSERVATION BIOLOGISTS AND EDUCATORS/NATURALISTS AS FORESTERS ON ITS STAFF**

Develop more diversity within the ranks of the Forest Service and reach out to groups and individuals that you have not traditionally attempted to contact. Diversity can be created in the professional staff of the Forest Service. Every national forest should have as many conservation biologists and educators/naturalists as foresters on its staff. It should also attempt to recruit employees from all backgrounds and with all political beliefs. The Forest Service is still too much of a "good old boy"

organization and it needs to become more representative of the American public. (Individual, Waterbury, VT - #A15433.15164)

#### **427. Public Concern: The Forest Service should educate personnel.**

##### **TO UNDERSTAND THAT COMPETING INTERESTS ARE NOTHING NEW**

Reeducate the United States Forest Service employees that “competing values and limited resources” is NOTHING NEW. They act and manage as though it is. (Business or Association, Cody, WY - #A26503.15164)

##### **TO ADEQUATELY UNDERSTAND POLITICAL, MANAGEMENT, AND LEADERSHIP ISSUES**

The Forest Service must better understand political, management, and leadership issues of working “effectively with individuals and groups with strongly competing views, values and beliefs.” There is little evidence that that agency has given much thought to these complexities; hence most agency engagement tends away from collaboration and engagement and toward older forms of command and control behavior—often thinly camouflaged with language hinting at collaboration and positive interaction in search of public interest. The Forest Service must also put aside its own vested self-interest if it is to have any chance at working effectively with all parties. (Union, Eugene, OR - #A6245.15160)

##### **TO WORK WITH A DIVERSE CONSTITUENCY**

For future decisions, one must do extensive training for Forest Service personnel so they can begin to understand how to work effectively with a diverse constituency. (I apologize for picking on the Forest Service regarding public involvement—the agency does far better than other federal, state, county and city agencies—it is a truly tough job. (Individual, Olympia, WA - #A4503.15150)

Facilitation training should be increased within the Forest Service to improve the ability of Forest Service planners and line officers improve their effectiveness in leading meetings at which a diversity of interests and views are represented. The use of facilitators from outside the agency should also be considered in meetings that may become contentious. (Civic Group, Roanoke, VA - #A1713.15164)

##### **TO FACILITATE COOPERATIVE MEETINGS**

It is the job of the Forest Service to foster cooperative meetings where opposing needs and views can be expressed and respected. Expressing a willingness to hear all views and to accept proposals as potential solutions is a powerful way to encourage cooperation. Forest management is not just for trees.

There is training available in a class once called “Negotiating to Yes” that should be given to all Forest Service staff and used in this pursuit. Dale Carnegie classes are another good resource. (Individual, Salem, NH - #A8263.15160)

### ***Will of the Public/Elected Representatives***

#### **428. Public Concern: The Forest Service should abide by the wishes of the majority.**

The Forest Service should do what the majority of Americans want done with their federal wildlands. The USFS should question and poll the American public to find out what they do want. Limiting the breadth of such an outreach for comments at the city limits of local communities is a crime. Whatever Administration is in power should accept that. Clearly, the majority should rule. (Individual, Grangeville, ID - #A830.15100)

Last time I checked the United States was still a democracy. The people have spoken, and there is no compelling national interest of which they are unaware that could possibly justify ignoring them. Do so at your peril. (Individual, Nickelsville, VA - #A347.15110)

An opportunity for all people to voice their concerns should be met with decisions made based on the majority not by snowmobile or 4 wheelers spending money to be heard louder. (Individual, Livingston, MT - #A661.15110)

#### **BY PRESERVING ROADLESS AREAS**

The viewpoint of the majority, especially a clear majority, should be accepted. Thousands of citizens have indicated that they want our National Forest roadless areas preserved. (Individual, Fairhope, AL - #A13377.15165)

The ANPR specifically states that 9 million acres within IRAs are considered by the Service to be productive timberland and candidates for road construction. The point of a national standard is the recognition that the vast majority of American citizens recognize a value other than extractable resources in our public lands—let's leave the IRAs alone! (Individual, Seattle, WA - #A17840.15165)

#### **BECAUSE NATIONAL FOREST SYSTEM LANDS ARE OWNED BY THE MAJORITY**

We live in a democracy and the Forest Service should give weight to the overall opinions of all Americans. After all these lands belong to all individual citizens of the U.S. and the interests of a few special interest should not dominate over those of the majority. Splitting the baby in half (so to say) is not the way to go and will only lead to more degradation of these unique and limited lands. (Individual, Takoma Park, MD - #A16325.15165)

#### **RATHER THAN THE PRESIDENTIAL ADMINISTRATION**

The forest service can work most effectively to meet competing views by following the views, beliefs and guidance of the public majority. The public majority has spoken during the first USFS solicitation of public comment and that majority overwhelming favored roadless protection. Unfortunately, the forest service has bowed to the biased pressure of the new presidential administration and ignored the guidance of the public majority. (Individual, Petaluma, CA - #A17057.15110)

#### **RATHER THAN PRIVATE INTERESTS**

The Forest Service should step up to the plate and protect the public interest, as opposed to competing private interests in the forest. Had they been doing so, we would never have been at the point where we are, with so little native forest left in this nation. The Forest Service should abandon its proclivity to be a front for the timber barons and to return to the mission originally envisioned for the forests [by] Teddy Roosevelt and Gifford Pinchot. (Individual, No Address - #A16452.15165)

#### **RATHER THAN SPECIAL INTEREST GROUPS**

You need to allow the American public, not special interest groups dictate the policies of the Forest Service. Please allow us access to public property so long as we use it responsibly. (Individual, Las Vegas, NV - #A921.15100)

. . . “our” National Forests are truly the property of all our citizens. Not the property of extractive industry. I don't think that I would want someone digging around in “my” backyard. It would not be a good idea to do this on the part of the digger.

It is my understanding that Mr. Bush is making an attempt to open my “backyard” to the financial gain of private industry. I see that as theft. (Individual, Harmony, MN - #A43.15110)

This clearly indicates that changes being proposed may be in the interests of business and special interest groups, but that the will of the people as expressed in hearings has been demonstrated to support upholding of the present rule.

Please listen to and honor the will of the people and do not give in to profit-driven concessions which are being requested by business interests. The forests are a very precious national resource which should be managed in the interests of the people of the United States. (Individual, Concord, CA - #A238.15110)

What is NOT acceptable, is for powerful corporate and special interests to override the views of me and my neighbors with their own agendas, though this continues to be the disturbing political reality in many of these issues. (Individual, New Haven, CT - #A706.15120)

Extreme environmental groups, under the guise of conservation, will never let up pressuring land managers to comply with their hidden agenda. If they were to reach a compromise, they would not have a reason to secure and spend the incredible funding they routinely obtain. The average, forthright, accountable, American citizen relies on the FS to fairly and equitably administer public lands without bowing to the biased pressure of high volumes of post cards, form letters and e-mails, just because one group may be more organized or highly funded than typical Americans. (Association, Salt Lake City, UT - #A12009.15121)

#### **RATHER THAN MERELY AVOIDING LITIGATION**

I attended a public meeting where a USFS official indicated that one of the reasons the 'roadless' rule was under consideration was because the USFS was continually being sued over its decisions to allow certain activities. That is the weakest reason I've ever heard for instituting a public policy. Policy should be established by what is in the public best interest, not by willingness to litigate. (Individual, Anchorage, AK - #A22124.15165)

#### **WHILE PROTECTING MINORITY RIGHTS**

The Forest Service has a very tough job in working this out. Our tradition is majority rule while protecting minority rights. These are federal lands, so the majority involves the American people, not just one state. So the Forestry Service needs to understand what most Americans want, and do its best to implement those wishes without unjustly affecting the rights of the minority. (Individual, Saratoga, CA - #A22433.15165)

### **429. Public Concern: The Forest Service should allow elected officials to make decisions.**

I feel a compromise must be made somehow. Let Jim Hansen decide for Utah . . . for the rest of the states . . . let their rep. figure it out. Special interest groups and lawyers don't belong in the process . . . elected/appointed officials do. Heaven help us with groups out there like the Sierra club, Utah wilderness Club, and Utah Wilderness Coalition. If they had their way, they'd drain lake Powell . . . what's next??? (Individual, Ogden, UT - #A590.15100)

Certainly we agree that reliable information and accurate mapping, and drawing on local expertise and experience through the local forest planning process is important. However, in the past federal agencies have failed to recognize the republican form of government in which we operate. Instead most decision making within the federal government says each person commenting equals one vote. In fact comments from local governments in our form of government says that those elected local officials should represent, for example, in a county of 10,000 people as a constituency and therefore their position represents 10,000 votes. Environmentalists have been appointed by no one, and they have no constitutional or elected power to represent anyone. They are accountable to no one. In that light then informed decision making must include the fact that when San Juan County speaks it is with the force of roughly 14,000 people. If that rule is not adhered to then there is no **informed decisionmaking**. (Elected Official, San Juan County, UT - #A4890.15111)

It is time for our elected and appointed officials to act as guardians of our land. This will take strong people because those interests who have exploited the lands for years are well entrenched, are very powerful lobbies, are willing to spend millions in order to ensure they can continue to exploit the lands so as to benefit financially. Ironically, some individuals and companies who have used but not abused the public lands in their pursuit of utilizing natural resources are forced to compete with the abusers and often, for survival, must themselves exploit the public lands. It is people such as yourself who must set the stage for conservation and allow the use of public lands but prohibit the abuse of these same lands.

At the same time, it is imperative to isolate some of these lands by designating them as roadless areas. (Individual, Laramie, WY - #A998.15120)

## *Ecosystem/Preservation Values*

### **430. Public Concern: The Forest Service should place the highest value on ecosystem preservation when managing conflict.**

Once a roadless area becomes roaded, it changes its identity and cannot be returned to its prior condition. The Forest Service should set its priority as preservation of the roadless condition and then reconcile the wants of different people to the first priority of preservation. (Individual, Bozeman, MT - #A282.15167)

Competing stakeholder interests - The U.S. Forest Service has a challenging, deeply political job. I would encourage it to manage its difficult stakeholder relations with the following guidance in mind: make decisions based upon the respect for the other living things with whom we share this planet; make decisions recognizing that scarcity warrants additional consideration (late seral habitat, disappearing species, quiet places), make moral not just economic choices, make decisions recognizing that man can make its living elsewhere but forest animals do not have that choice. (Individual, Lacey, WA - #A530.15167)

The forest service should err on the side of caution. If two parties are split as to whether a roadless area should be opened for roads, or left roadless, the choice which is ultimately made must be in favor of the "roadless" option.

The reason for this is clear: A roadless area which is exploited today cannot also be exploited tomorrow. ON the other hand, if a roadless area is left alone for a year, or for ten years, it can eventually be opened up for roadbuilding. By erring on the side of caution, you merely put off a decision until another day. By ignoring pleas to keep areas roadless, the roadless area is destroyed forever. (Individual, Columbus, OH - #A659.15162)

#### **BY BEING A STEWARD OF THE FORESTS AND AN ADVOCATE FOR WILDLANDS**

One comment point was how to work with diverse groups of differing opinions. First, what is the goal of the Forest Service? I believe that the Forest Service should be a steward of the forest and an advocate for wild lands. I believe that the native tribes, and the public should be included in the decisions concerning the public lands. Diverse opinion will always occur, State and Local communities should have a say, but they should not control or dominate the process. (Individual, Boise, ID - #A209.15160)

